

ISLAMIC FINANCE: KAZAKHSTAN MARKET ANALYSIS

**Astana
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DANIYAR KELBETOV

Chief Product Officer,
AIFC Authority

Dear friends and colleagues,

The development of the Islamic finance is an integral part of the Astana International Financial Centre. The Centre has created the necessary conditions for the operation of Islamic financial institutions in both retail and corporate segments.

With the support of Islamic and Asian Development Banks, a favorable legal and regulatory framework has been created in accordance with the best Islamic financial practices and standards. Since its establishment, the AIFC has been a member of international organizations in the field of Islamic finance, such as AAOIFI, IFSB and CIBAFI.

At the same time, we understand that the lack of available data is a significant obstacle to the development of the market. In preparing this report, we have carried out extensive data collection and analysis. And we hope this report will become a valuable source of information for current and potential participants.

We would like to thank everyone who contributed to this report.



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EXECUTIVE SUMMARY

The Astana International Financial Centre (AIFC) has strategically prioritized the development of Islamic finance. Since its inception, the AIFC has made remarkable strides in advancing Islamic finance within Kazakhstan and the broader region. Notably, Kazakhstan was ranked 22nd in the Islamic Finance Country Index by the Global Islamic Finance Report 2023. Additionally, the Islamic Finance Development Indicator by ICD-Refinitiv 2021 underscored Kazakhstan's impressive performance, with an overall score of 17.55, surpassing the global average of 11.01. This achievement positions Kazakhstan as a regional frontrunner in the Islamic finance industry.

Under the AIFC regulatory framework, designated entities are permitted to undertake a broad spectrum of finance activities, compliant with Shari'ah principles. These activities span Islamic banking, Islamic financing, Islamic insurance and reinsurance (takaful and re-takaful), Islamic fund management, and the issuance of Islamic securities, including shares and Sukuk.

For further development of the Islamic finance in Kazakhstan, it appears prudent to undertake a study to evaluate the demand for Islamic financial products within Kazakhstanis' society. This will enable the AIFC to gather essential insights into market dynamics, needs, and trends, with the help of which it will empower the position of Kazakhstan as a competitive and attractive destination for Islamic finance and enhance the AIFC's appeal, not only to international investors and financial institutions seeking opportunities in a vibrant market, but also to local investors and financial institutions.

Currently, the development of Islamic financial products for both retail and corporate segments primarily interests practicing / deeply religious Muslims¹ (as individuals or business owners).

For individuals of other religions, or those without any religious affiliation, adherence to Islamic financial principles may not be a critical concern. Instead, their focus tends to be on economic benefits and financing conditions.

Consequently, at this initial stage of the development of Islamic finance they were not included in the study. However, as Islamic financial instruments will begin to emerge in the market, these individuals and companies will be involved in subsequent stages of the research.

For the retail segment, the market demand at the initial stage is estimated to be as follows:

1. Islamic deposits – up to KZT 2,83 trillion;

¹ according to the Methodology

2. Islamic installment plans - up to KZT 230 billion;
3. Islamic unsecured financing – up to KZT 1,03 trillion;
4. Islamic car financing – KZT 1,07 trillion;
5. Islamic mortgage – KZT 1,6 trillion (at market rate) and 1,34 trillion (at preferential/subsidized rate);
6. Islamic insurance (premiums) – KZT 67 billion; and
7. Sukuk investments by retail – KZT 46 billion.

For the corporate segment, the current market demand exceeds KZT 760 billion.

PART 1:
RETAIL ISLAMIC FINANCE

1.1 METHODOLOGY

Since the "Below 18 years" group is generally not considered economically active and does not participate in the formal economy to the same extent as adults because of legal restrictions, they are often not a primary focus for financial institutions offering products and services, unlike the working-age population. Consequently, their headcounts were excluded from the analysis.

The method of collecting information was a mass survey of the population in online and offline format (quantitative research method):

- Online: one of the primary methods employed was promoting the survey through the mobile application Sajda. Another method which also played a crucial role was partnering with prominent bloggers.
- Offline: with the authorization of the Spiritual Administration of Muslims of Kazakhstan, the offline information collection method hinged on strategic placement of roll-up banners (each displaying a QR code with the redirect to the questionnaire) within numerous mosques of Kazakhstan.

Population and sample size

The 2021 population census² shows that:

- 65,4% of the population aged 20 years and above indicated Islam as their religion; and
- 66,3% of the population aged 15 years and above indicated Islam as their religion.

We can assume that **about 66% of the population aged 18 years and above are Muslim.**

The 2021 sociological study³ titled "Assessment of state policy in the religious sphere of the population of Kazakhstan," commissioned by the Ministry of Information and Social Development of the Republic of Kazakhstan, offers detailed insights into the religious beliefs of the country's adult population. By performing direct calculations, we find that **practicing (i.e. deeply religious) Muslims constitute 19.5% of the total population aged 18-65 (27.4% of the population between 18 to 65 years identified themselves as deeply religious, of those - 71.2% are Muslims).**

Note: deeply religious - who strictly observe the rules and rituals within their religion.

According to the Bureau of National Statistics, there are 11 508 280 people in this age group as of beginning of the 2023. For our study, we assume the practicing Muslims

² <https://stat.gov.kz/ru/instruments/dashboards/28424/>

³ https://www.gov.kz/uploads/2022/4/11/cbbba9d393033b71542190605fad9069_original.441940.docx

still constitute 19.5% of the population aged 18-65. That gives us an estimate number of practicing Muslims across Kazakhstan – 2 245 127 individuals. This figure is broadly consistent with data provided by the Sajda mobile app, which reports having over 2,5 million registered users in Kazakhstan.

One has to note that the number of respondents includes individuals aged over 65 years, but this has no impact on the results as the age group 61+ comprises about 1% of the total number of respondents.

We used a statistical sampling method to infer that the number of survey respondents represent an estimate number of practicing Muslims in the population.

$$n = \frac{\left(\frac{Z^2 \times p \times (1 - p)}{E^2}\right)}{1 + \left(\frac{Z^2 \times p \times (1 - p)}{E^2 \times N}\right)} \quad \text{where:}$$

n – required sample size
Z – score (2.58 for 99% c.l.)
p – standard deviation (0.5)
E – margin of error (2%)
N – population size

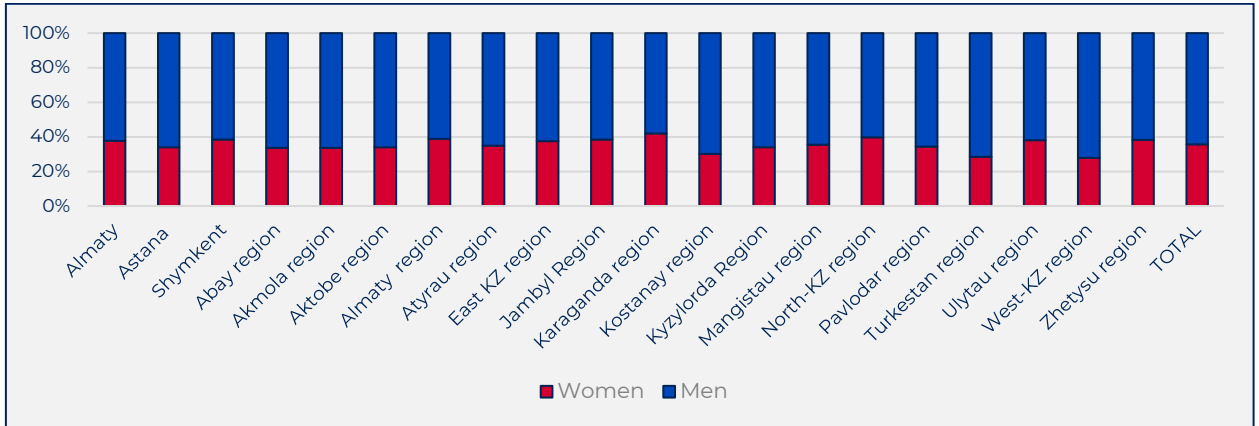
The standard of deviation is set at 0.5 (50%), which is the standard practice in quantitative research. The confidence level is set at 99%. This value measures the degree of certainty regarding how well a sample represents the overall population within chosen margin of error. And the margin of error, which we are ready to accept is +/- 2 percent.

Based on the calculations, we need a sample size of randomly chosen 4 153 respondents from the population of 2 245 127 practicing Muslims to representatively reflect the population's characteristics. The actual number of respondents (12 190) is almost thrice more the required random sample size.

1.2 GENERAL PORTRAIT OF THE RESPONDENTS

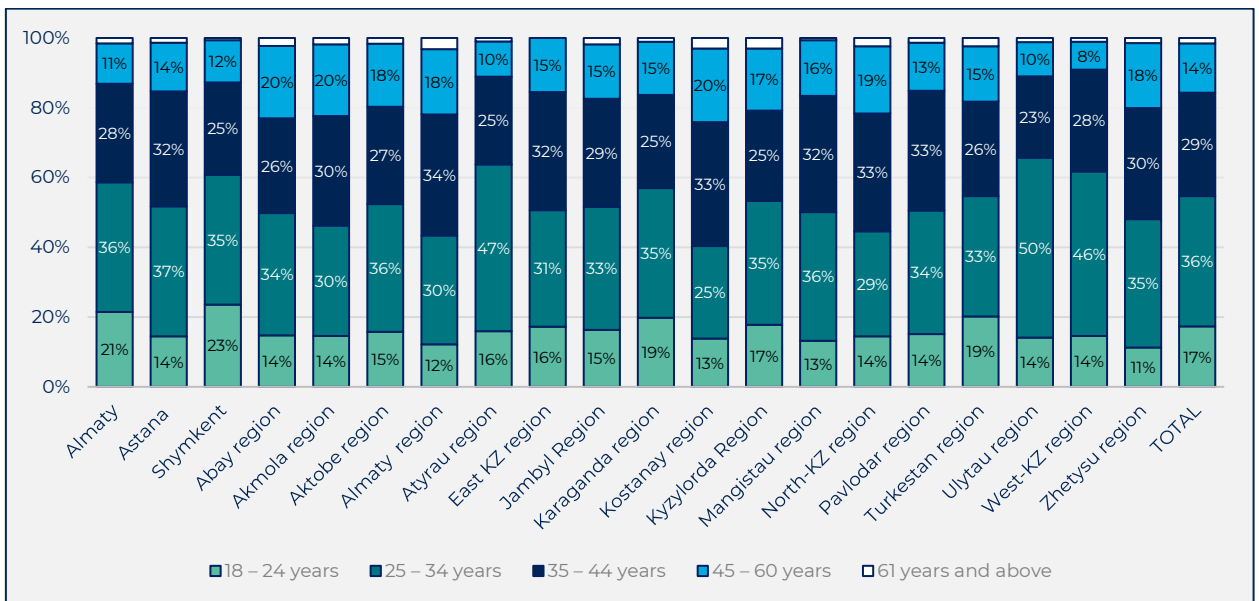
Gender Distribution

The results show a gender skew towards male participants, who make up on average 64% of the survey population across all regions, compared to females who represent on average 36% across all regions.



Age Groups

The "25-34 years" and "35-44 years" age groups have the highest number of respondents, showing strong engagement from these demographics. This might be explained that many of them are in the midst of advancing their careers, starting families, and making significant financial decisions, such as purchasing homes or starting businesses, thus these age groups are likely to form the future core customer base for Islamic financial products. The age group 61+ comprises about 1% of the total number of respondents.

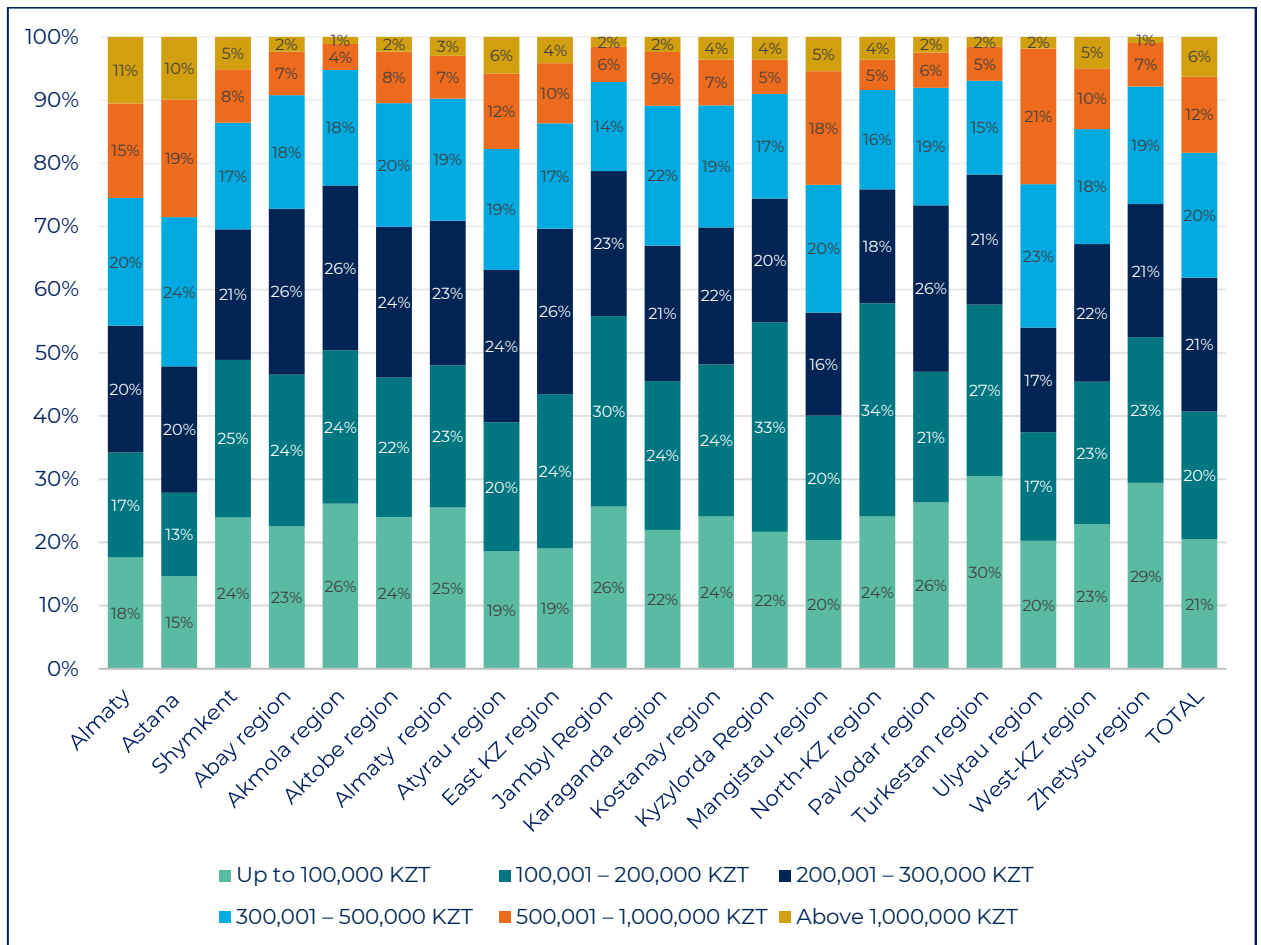


Income distribution

The income breakdown for the surveyed population is as follows below, with each income bracket representing the average distribution across all regions.

In total, there are about equal splits (~20%) between income groups of: (1) up to 100,000 KZT, (2) 100,001 – 200,000 KZT, (3) 200,001 – 300,000 KZT; (4) 300,001 – 500,000 KZT; (5) above 500,000 KZT.

The median monthly salary in the Republic of Kazakhstan in Q4 2023 was 259 463 tenge⁴, which also means that the survey data is somewhat in line with the national statistics.



Regional distribution

The most active regions are Almaty and Astana, which, as major cities, boast considerably higher numbers of respondents, tallying at 2 755 and 2 327 respondents respectively. As principal urban and financial centers, these factors account for their heightened activity levels in the survey. The remaining regions exhibit moderate

⁴ [Number and wages of employees in the Republic of Kazakhstan \(IV quarter of 2023\).pdf \(stat.gov.kz\)](#)

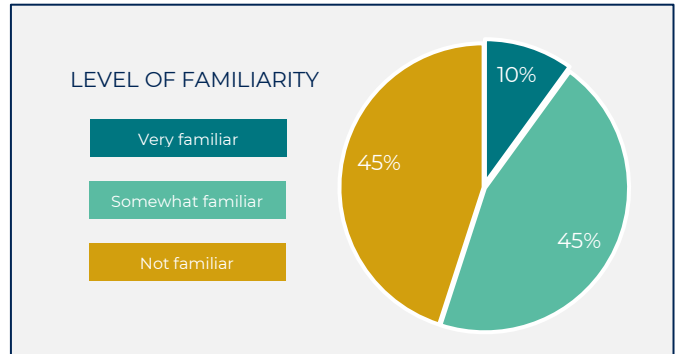
levels of engagement, as well as they represent untapped markets with potential for growth in the Islamic Finance sector.

	(1)	(2)	(3)	(4)	(5)	(6) = (4) / (3)
Place of living	Population aged 18 -65 years	% in KZ	Practicing Muslims (~19,5 % of the citizens)	Respondents aged 18 and above	% in the survey	Coverage
Astana	839 718	7%	163 819	2 327	19%	1,42%
Almaty	1 337 488	12%	260 928	2 755	22%	1,06%
Shymkent	652 297	6%	127 255	818	7%	0,64%
Abay region	359 493	3%	70 133	217	2%	0,31%
Akmola region	483 644	4%	94 353	268	2%	0,28%
Aktobe region	539 479	5%	105 246	725	6%	0,69%
Almaty region	861 261	7%	168 022	502	4%	0,30%
Atyrau region	386 710	3%	75 442	721	6%	0,96%
East-KZ region	446 456	4%	87 098	168	1%	0,19%
Jambyl Region	670 723	6%	130 850	448	4%	0,34%
Karaganda region	694 518	6%	135 492	551	5%	0,41%
Kostanay region	526 971	5%	102 806	166	1%	0,16%
Kyzylorda Region	456 463	4%	89 050	332	3%	0,37%
Mangistau region	411 086	4%	80 198	589	5%	0,73%
North-KZ region	336 831	3%	65 712	83	1%	0,13%
Pavlodar region	467 611	4%	91 225	285	2%	0,31%
Turkestan region	1 099 384	10%	214 477	505	4%	0,24%
Ulytau region	128 804	1%	25 128	163	1%	0,65%
West-KZ region	413 553	4%	80 679	363	3%	0,45%
Zhetysu region	395 790	3%	77 214	204	2%	0,26%
Total	11 508 280	100%	2 245 127	12 190	100%	0,54%

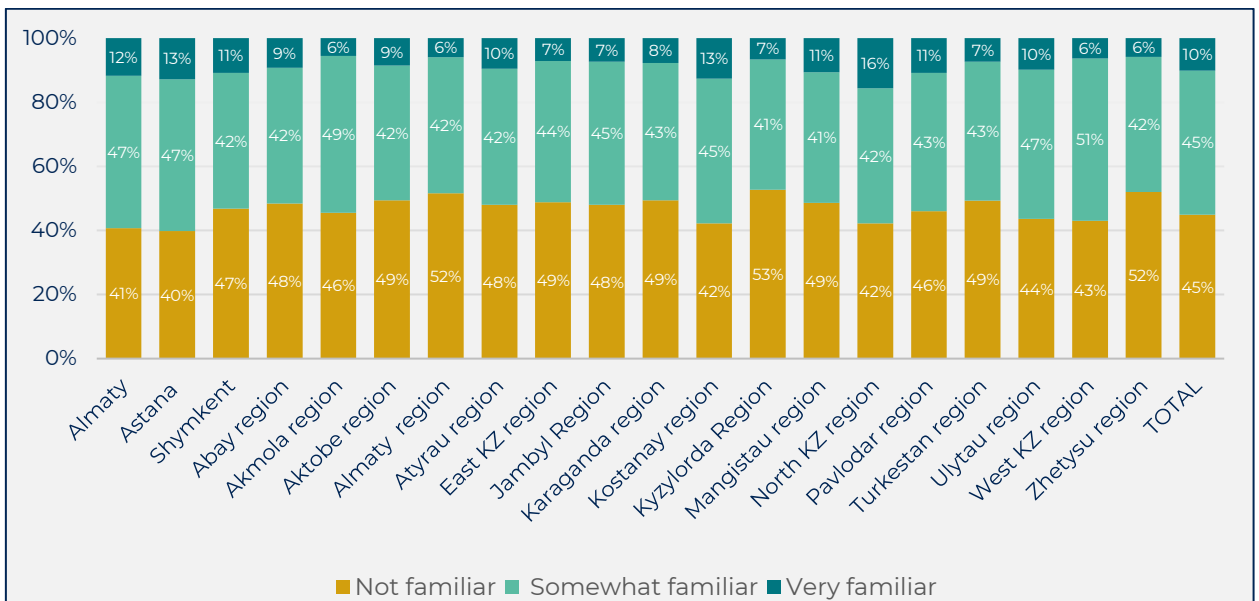
1.3 AWARENESS AND PREFERENCES

Familiarity with Islamic financial products

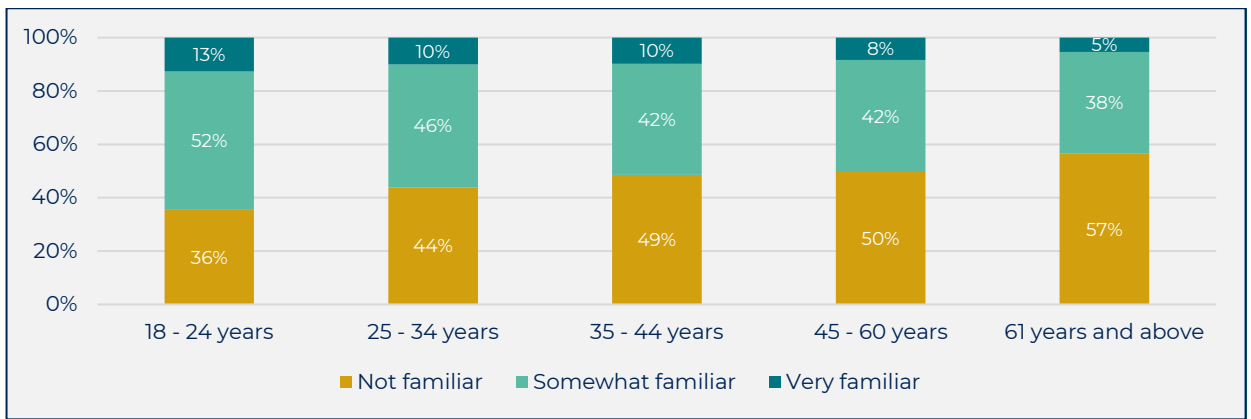
The analysis of the survey data regarding the familiarity with Islamic financial products and services across various regions reveals several insights. Out of the total respondents, 45% possess some familiarity, another 45% are not familiar at all, and a mere 10% report being very familiar with Islamic financial products and services.



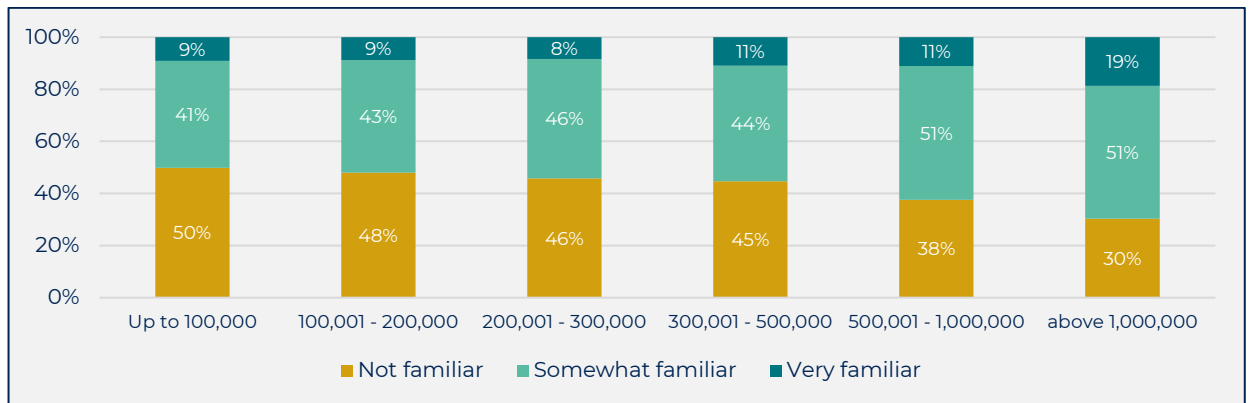
A moderate level of overall awareness with a significant portion of the population not being familiar with these services can be traced throughout all regions. This gap in knowledge and understanding of Islamic finance among the respondents coupled with the marked inaccessibility of Islamic financial products for the average consumer, underscores a longstanding issue within Kazakhstan's Islamic finance sector.



From the data presented, a clear trend emerges: as the age of the respondents increases, their unfamiliarity with Islamic financial products correspondingly increases as well. Younger respondents appear to be more in tune with the nuances and offerings of Islamic finance, whereas older individuals show a relative lack of knowledge. This pattern highlights the need for targeted educational and marketing efforts to bridge this knowledge gap across different age groups, ensuring a broader understanding and acceptance of Islamic financial products across the entire population spectrum.



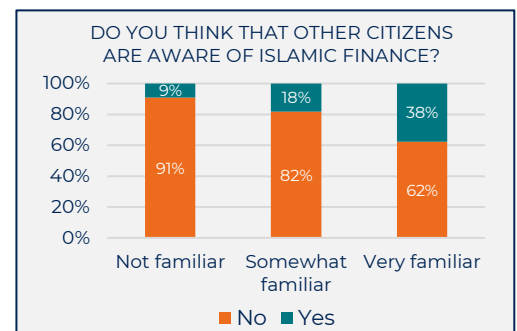
The data also distinctly illustrates that as respondents' income increases, their level of acquaintance with these financial products also rises. However, the link between income and familiarity could be influenced by various factors, including access to better financial education, exposure to more diverse financial options.



Perception of citizens' awareness of Islamic finance

The survey indicates that a significant majority of respondents (84%) believe that the other citizens in their region are not aware of Islamic finance. This perception is influenced by several factors, among others, low market share of Islamic Finance, it accounts for only a small fraction (0.2%) of the total financial sector, thus naturally having less visibility, that is media coverage.

The analysis of the data also shows an interesting correlation between respondents' self-assessed familiarity with Islamic financial products and their perception of the general public's awareness. However, this trend underscores a potential cognitive bias, known as the "false-consensus effect", where individuals project their own level of knowledge onto others.



Role of advertising of Islamic financial products

The majority of respondents believe targeted advertisements could significantly increase their interest in Islamic financial products. Specifically, 10148 participants, making up 83% of those surveyed, supported this viewpoint, while 2042 respondents were not in agreement. Notably, those who are very familiar with Islamic finance, as well as those who possess some degree of familiarity, showed a slightly higher tendency to affirm the effectiveness of targeted advertising.



Based on the survey results, it appears that the currently operating Islamic banks in Kazakhstan are likely to garner substantial support from the practicing Muslim population, even without intensive marketing efforts. Another important aspect is that financial institutions must keep in mind that when promoting Islamic financial products, they should position them as inclusive offerings, not limited to Muslims but available to all individuals. This emphasizes the universal applicability of Islamic financial products which broadens their potential.

According to specialists in Islamic finance⁵, there is a significant branding consideration for Islamic financial institutions operating within secular societies. The term "Islamic" may not be suitable in the context of secular societies and they suggest a rebranding of the industry. As examples, the specialists point out that such institutions are referred to as "participation banks" (katilim) in Turkey, "non-usury" (non-riba) banks in the United States, "alternative finance" in the United Kingdom, "partnership finance" in Russia, and "social" or "non-usurious banks" in Morocco. Notably, in the UK, the term "alternative finance" is sufficiently mainstream that non-Muslim Britons are comfortably taking out mortgages from these institutions.

Importance of compliance with Islamic principles

A significant majority, namely 10 983 respondents, which accounts for 90% of the total, consider compliance with Islamic principles as 'Very important' when choosing a financial product. This overwhelming majority underscores a strong requirement for financial products to adhere to Islamic principles among the respondents as well as it is indicative about substantial market for Shariah-compliant financial products.

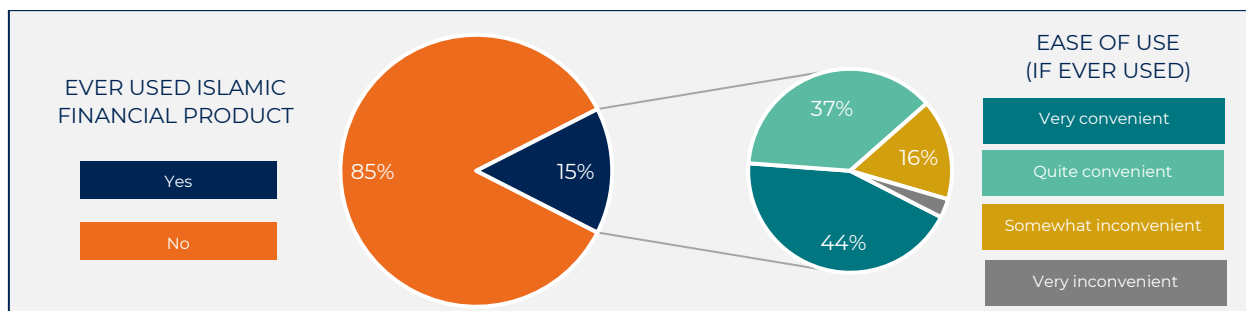
⁵ https://forbes.kz/actual/expertise/azastanda_islamdyi_arjyilandyiru_ralyinyi_damuyina_ne_kederg/

9% of the respondents were uncertain or found it difficult to answer, while a very minor proportion (1% of the total) do not find compliance with Islamic principles important when selecting a financial product.

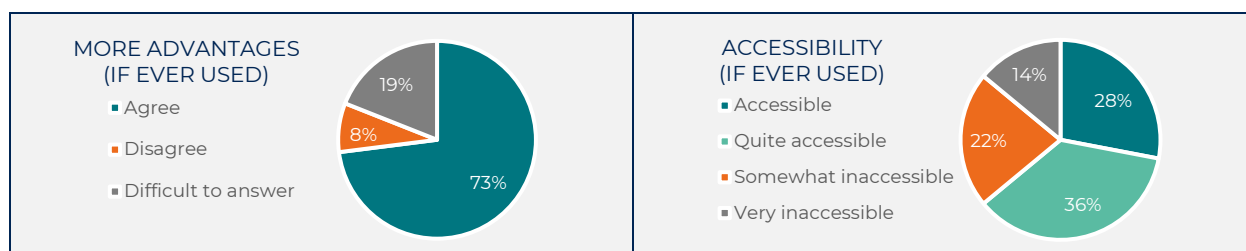
It is worthy to mention, that the only fact that financial institution operates in compliance with Islamic principle can be a significant factor in its market acceptance and growth as evidenced by the case in Malaysia. Since the introduction of Islamic banking in 1983, such products had been well-received by the public. This acceptance was mirrored in the growing total deposits and loans based on Islamic principles, from both Muslim and non-Muslim customers. Take Bank Islam Malaysia Berhad (BIMB) as an example; at the end of June 1984, which marked its first year of operation, total deposits stood at RM 241 million, and total loans at RM 162 million. By the end of its tenth year in 1994, those numbers reached RM 2,548 million and RM 977 million respectively. In another ten years, the figures further impress with deposits reaching RM 11,269 million and loans at RM 7,640 million. That is a 47-fold increase in 20 years.

Use of Islamic financial products

The survey results show that only 15% of respondents have experience with using Islamic financial products or services. Over 80% of those who have used such products find them to be convenient in use. Conversely, the vast majority, representing 85% or 10 347 respondents, have not utilized any Islamic financial products, citing various reasons for their non-use which are presented below.

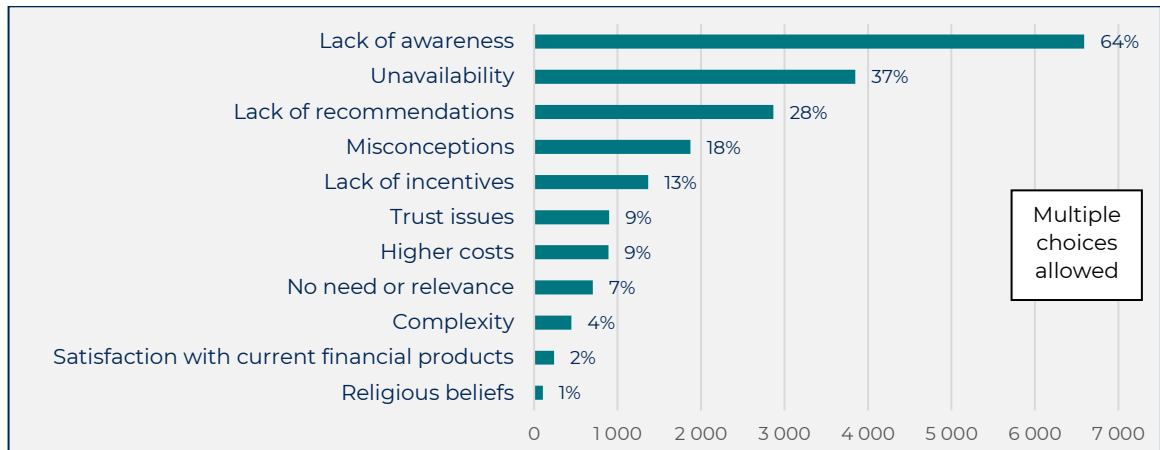


Among the 1 843 respondents (15%) who have used Islamic financial products, a specific question was posed to assess their perspectives on whether these products offer more advantages compared to conventional ones. 73.2% of those respondents believe that Islamic financial products offer more advantages over conventional ones. And 63.6% find Islamic financial products to be at least somewhat accessible, indicating that a significant number of people can obtain and use these products with varying degrees of ease.



Reasons preventing the use of Islamic financial products

Those who have not used Islamic financial products, representing a weighty number of 10 347 respondents (85% of total), cited the following reasons:



Key takeaways from these responses:

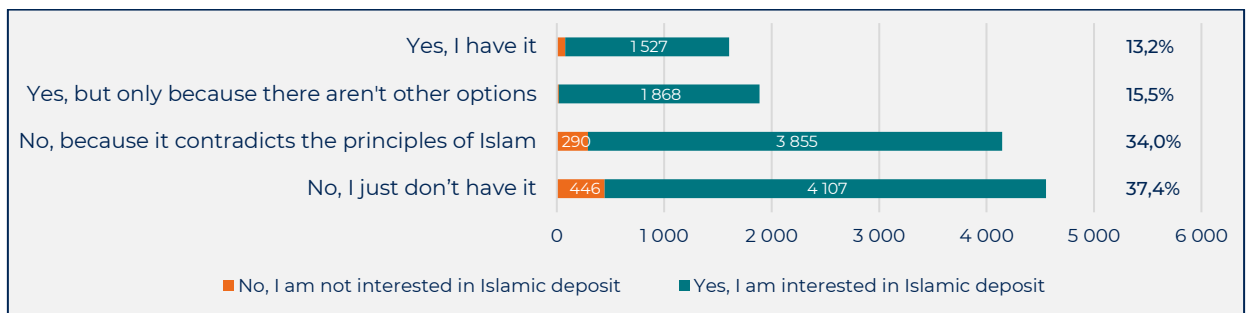
1. *[Lack of awareness, misconceptions]* The primary obstacle identified is a significant scarcity of information, revealing a vast potential user base that remains untapped due to informational deficits about Islamic financial principles. Nearly one-fifth of the respondents also have some misconceptions about Islamic finance.
2. *[Lack of recommendations, trust issues]* Trust is a cornerstone in finance. And transparency is a cornerstone in fostering trust. Islamic financial institutions should strive to be transparent by openly sharing information about their operations, policies, decision-making processes, compliance with the regulations. And then through excellent client services and products, financial institutions can attract more customers through word-of-mouth.
3. *[Unavailability]* Availability ranks second highest, pointing to the scarcity not only of Islamic financial institutions but also lack of their branches throughout Kazakhstan. Additionally, there is a limited range of product offerings available.

1.4 MARKET DEMAND

A specialized methodological approach was developed to explore the intricate dynamics and subtleties of practicing Muslims' banking relationships, focusing on their interactions with conventional banking products and their openness to Islamic financial products in Kazakhstan. To accomplish this, we posed specific questions to participants regarding their use of conventional banking services, including active bank deposits, installment plans, mortgages, consumer loans, car loans, insurance policies, and investments in securities. Their responses were then classified into four clearly defined categories. Following each question about conventional products, we introduced alternatives from Islamic finance to gauge interest in these alternatives. This approach helped us to understand nuances of both the existing banking relationships and the potential receptivity to Islamic financial products in Kazakhstan.

1. Islamic deposits

Questions posed: Do respondents have a conventional deposit, and would they be interested in Islamic deposit?



- The first group (“Yes, I have it”), comprising 13,2% of the total, holds conventional deposits. Majority showed interest in availing themselves to Islamic deposits despite currently holding a conventional deposit. However, they might not immediately apply for Islamic deposits.
- 15,5% of respondents have a conventional deposit, not out of preference but due to a lack of alternatives. Almost all (99%) expressed interest in Islamic deposits, suggesting **this group will make conscious preference towards Islamic financial deposits** if they were available. Since the current Islamic banks are not represented in all regions, the problem is still prevalent.
- A third of respondents do not have a conventional deposit, specifically because it goes against the religious beliefs. 93% of them are interested in Islamic deposits, and **this group represents a significant untapped market opportunity** for Islamic deposits.
- The remaining 37,4% of respondents do not have a conventional deposit for reasons not specified. 90% of them are interested in Islamic deposits, although it is assumed they might not have immediate savings to start Islamic deposits.

According to the statistics of the National Bank of Kazakhstan, the total retail deposits of the banking sector in both national and foreign currencies reached 20,4 trillion KZT as of Dec 2023⁶. Kazakhstan Deposit Insurance Fund, together with the Association of Financiers of Kazakhstan, also conducted a survey⁷ of bank clients, and they found that 95% in general use financial services: these include card, deposit, and current accounts, including those 66% who have deposits. Thus, about 7 595 500 people out of total population of 11,508,280 people have deposits; and that gives an **average deposit amount of 2 685 800 KZT**.

To calculate the immediate market demand for Islamic deposits, the following two groups were taken into consideration:

A. Practicing Muslims with conventional deposits but with conscious preference towards Islamic financial deposits.

99% of 348 000 individuals (15,5% of practicing Muslims) are willing to convert from conventional deposits to Islamic deposits. With that, the expected switch from conventional deposits to Islamic deposits is up to 924 billion KZT.

B. Practicing Muslims without conventional deposits because of religious beliefs.

93% of the 763 000 individuals (34% of the practicing Muslim population) outside the deposit system due to religious beliefs are able and willing to open Islamic deposit. Therefore, total amount of new Islamic deposits might reach up to 1 906 billion KZT.

Important note:

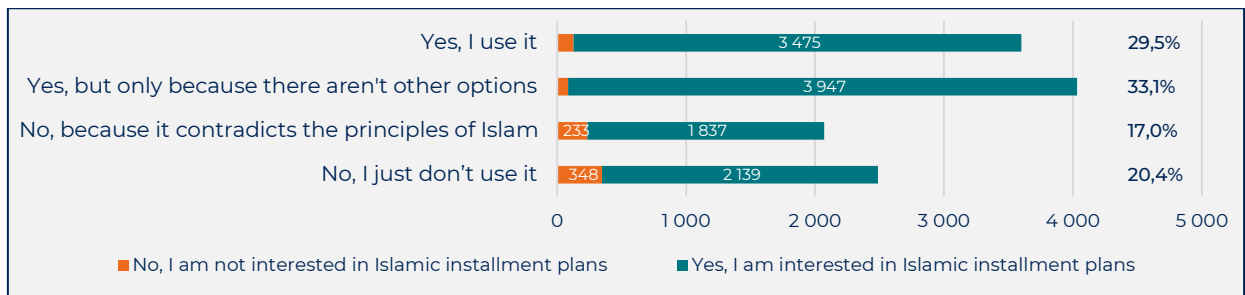
- *These results assume that the interest expressed by the surveyed individuals is reflective of the entire population of practicing Muslims. Thus, 28,6% of practicing Muslims have deposits, i.e. 642 000 individuals. With these calculations, it is concluded that there is no bias as only 8,5% of all deposit holders are practicing Muslims (although, out of all adult population – 19,5% are practicing Muslims).*
- *It is also concluded that there is no bias since with the additional 34% of practicing Muslims hypothetically entering the deposit system, the total would have reached 62,6% of practicing Muslims, which would have been in line with the proportion of the total population (66%).*
- *The results are also based on the assumption that each person's deposit size is proportional to their representation in the total deposits of the banking sector. It is also assumed that those individuals who do not have traditional deposits only due to religious beliefs would have potential average Islamic deposit size in the amount of average traditional deposit as it is today.*

2. Islamic installment plans (Buy now pay later, BNPL)

Questions posed: Do respondents currently use installment plans, and are they interested in Islamic installment plans?

⁶ <https://nationalbank.kz/ru/news/statisticheskij-byulleten/rubrics/2205>

⁷ <https://www.kdif.kz/press-tsentr/press-relezy/8-dve-treti-kazahstantsev-derzhat-depozity-v-bankakh-intervyu-predsedatelya-kfgd-agentstvu-kaztag/>



- The first group (“Yes, I use it”), comprising 30% of the total, currently engages with traditional installment plans. 96% of them showed interest, indicating a potential openness to availing themselves to Islamic installment plans despite currently holding a traditional installment plan. However, they might not immediately consider Islamic installment plans as compared to the next group.
- One third of respondents utilize traditional installment methods solely due to a lack of other viable choices, despite such options conflicting with their religious beliefs. Almost all (98%) expressed interest in Islamic installment plans, suggesting **this group will make conscious preference towards Islamic installment plans (Murabaha).**
- Another 17% of respondents avoid traditional installment plans on the grounds of religious convictions. 89% of them are interested in Murabaha, and **this group represents a significant untapped market.**
- The remaining 20% of respondents do not have installment plans, and probably are not planning to have neither conventional nor Islamic installment plans in the near future.

There are no statistics specifically for installment plan products that are offered by the conventional banks, so it is likely that the installment plans are categorized under “unsecured loans for consumer purposes”. As per First Credit Bureau analysts, the unsecured consumer loans portfolio as of September 2023 is valued at 9.5 trillion KZT and includes 7,6 million people. The following statements were made:

- For the 50% of people with the lowest loan amounts, average loan amount is 215 000 KZT;
- For the 90% of people with the lowest loan amounts, average loan amount is 686 000 KZT (or average loan amount for the middle 40% is 1 543 000 KZT); and
- For the top 10% of people with the highest loan amounts, the average loan amount is 5 500 000 KZT.

With this in mind, we can assume that about half of the unsecured loans are related to installment plans (BNPL) with a total portfolio of 817 billion KZT and average ticket size of 215 000 KZT.

To calculate the immediate market demand for Islamic installment plans (BNPL Murabaha), the following two groups were taken into consideration:

- Practicing Muslims with conventional BNPL but with conscious preference towards Islamic installment plans.

98% of the 743 000 individuals (33,1% of practicing Muslim population) are willing to convert from conventional BNPL. With that, the expected switch to Murabaha is up to 157 billion KZT.

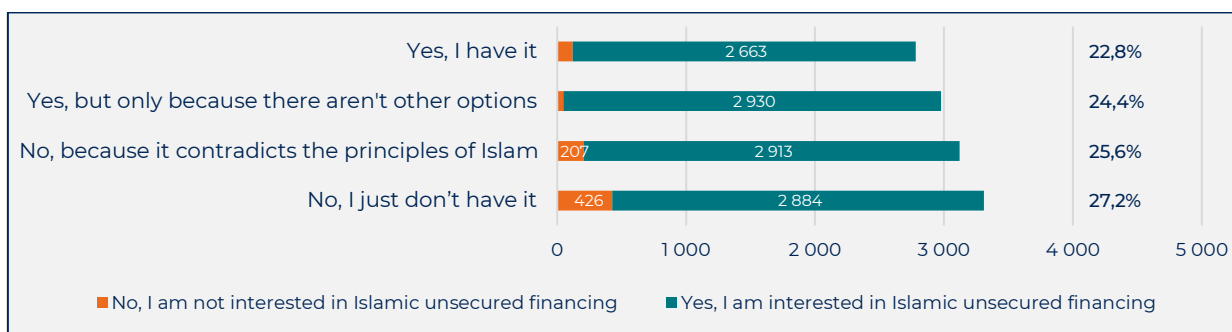
B. Practicing Muslims without conventional BPNL because of religious beliefs.

89% of the about 382 000 individuals (17% of practicing Muslim population) can apply for installment plan and will do so if it is Shariah-compliant. Therefore, total amount of new Islamic installment plans might reach up to 73 billion KZT.

Important note: If there is any bias in the survey results, it might not skew the results by much due to small amounts.

3. Islamic unsecured financing (excl. installment plans)

Questions posed: Do respondents have an unsecured consumer loan, and would they be interested in an Islamic financing alternative?



By utilizing the same findings of the First Credit Bureau analysts⁸, the unsecured consumer loans portfolio (excl. installment plans) can be assumed to be valued 8.68 trillion KZT with 3.8 million individuals involved and average ticket size of 2 284 000 KZT. At the same time, 80% of these people (which is the middle 40% mentioned in the previous section) with the lowest loan amounts owe 1 543 000 KZT on average.

Note: There might be a potential bias in the survey results as they might suggest that over 1 million (47%) of practicing Muslims have unsecured financing, or about 27,8% of all individuals with unsecured loans are practicing Muslims. For the purposes of excluding potential bias, it is suggested to cap this percentage at the average of 19,5% (% of practicing Muslims of total population) and 8,5% (% of practicing Muslims with deposits of total population), thus adjusting by the coefficient of 0,5 (= 14% / 27,8%).

By using similar approach as for the installment plans – to calculate the immediate market demand for Islamic unsecured financing, the following groups are considered:

⁸ <https://kz.kursiv.media/2023-11-23/print1012-hrms-loans/>

A. Practicing Muslims with conventional unsecured loans but with conscious preference towards Islamic financing.

98% of the 274 000 individuals (24,4% of practicing Muslim population, adjusted by 0,5) are willing to convert from conventional loan (with average ticket size of 2.3 mln KZT) to Shariah-compliant financing. With that, the expected switch is up to 617 billion KZT.

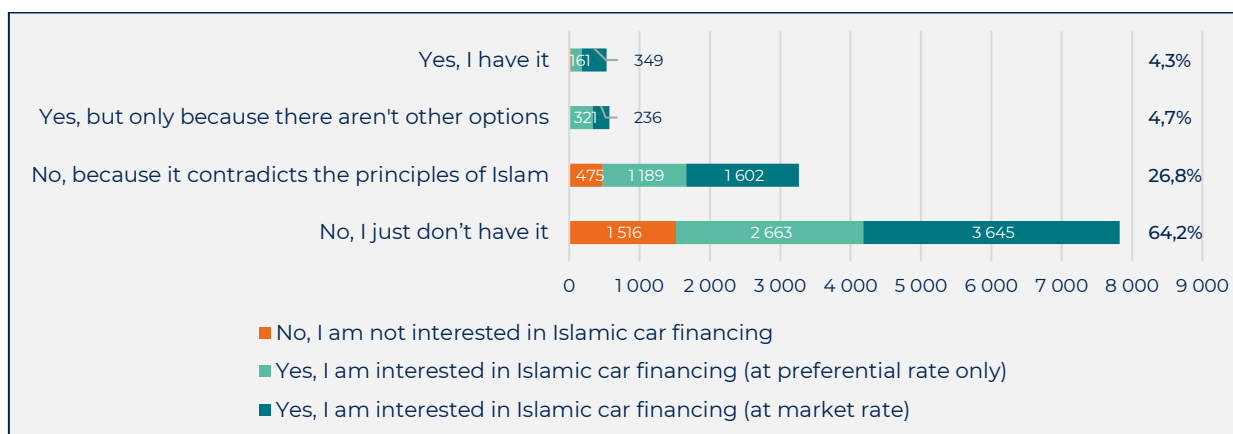
B. Practicing Muslims without conventional unsecured loans because of religious beliefs.

93% of the 287 000 individuals (25,6% of practicing Muslim population, adjusted by 0,5) can hypothetically apply for unsecured financing and will do so if it is Shariah-compliant. We can also assume that the average financing amount would be 1.5 mln KZT due to shorter or no credit history. Therefore, total amount of new Islamic unsecured financing might reach 412 billion KZT.

4. Islamic car financing

Questions posed: Do respondents have a conventional car loan, and would they be interested in using an Islamic car financing?

In relation to car financing, we tried to segregate the interest in car financing at market rates and at preferential rates (e.g. similar to terms of 4% car loan or akin to other government programs). The following diagram elaborates the results.



- Results might suggest that 4,3% of the practicing Muslim population currently have traditional car loan with Shariah compliance not being very important. 66% of them might be interested in Islamic car financing at market rates and another 30% only at the preferential rates. We can assume that this group will let their existing contracts run and will not consider refinance.
- Another 4,7% of the total practicing Muslim population also have traditional car loan but solely due to a lack of other viable choices not conflicting with their religious beliefs. 41% of them are willing to consider the car financing at market rates, and another 56% - only at preferential rates.

- 26,8% of practicing Muslims claim that they do not have car loan due to religious beliefs. 49% of respondents are open to Islamic car financing at market rates, and another 36% - only at preferential rates.
- Almost two-thirds (64%) of the respondents do not have car loans for other reasons not related to religious beliefs.

According to the First Credit Bureau⁹, the outstanding amount of car loan portfolio in Kazakhstan increased from 1.5 to 2.5 trillion KZT in the year 2023.

- During 2023, 208 thousand loans were issued with the total amount of 1.6 trillion KZT, which is more than by 82% over the preceding year despite the discontinuity of the government car loan program.
- Over the year 2023, the average size of new car loans is 7.5 million KZT. Number of new contracts – 208,4 thousand, increased by 88 thousand or 73%.
- Average size of outstanding car loans is 5.5 million KZT. Outstanding number of contracts – 454 thousand, up by 34,4%.
- Less than 40 000 contracts with maturity by end of 2025¹⁰ (less than 9% of all).
- The portfolio turnover is at about 4 years, up from 2.5 years in 2022.

Note: *There might be a potential bias in the survey results as they might suggest that 220 000 (9%) of practicing Muslims have car loans, or about 44,5% of all car loan contracts are related to practicing Muslims. Similarly, for the purposes of excluding potential bias, it is suggested to cap this percentage rather at 19,5% (% of practicing Muslims of total population) as it is asset-based borrowing, thus adjusting by the coefficient of 0,44 (= 19,5% / 44,5%).*

To calculate the immediate market demand for Islamic car financing, the following groups are considered:

A. Practicing Muslims with existing car loan but with conscious preference towards Islamic financing.

41% of the 46 500 individuals (4,7% of practicing Muslims, adjusted by 0.44) are willing to refinance via Islamic finance at market rates. If we exclude contracts with maturity by 2025 (9%) and use average car loan size of 5.5 mln KZT, the expected Islamic refinancing at market rate is about 95 billion KZT.

We can assume that other 56% from the same group, or about 26 000 individuals with car loans, have it at the preferential rate, as they are willing to refinance only at preferential rate. With such programs currently on hold, we expect such contracts to run till maturity or earlier without Islamic refinancing.

B. Practicing Muslims without car loans because of religious beliefs.

⁹ <https://kz.kursiv.media/2024-01-25/lgtn-avto-credit/>

¹⁰ <https://www.tcb.kz/api/v1/images?doc=true&main=true&name=1677565849227521016fullFileRU.pdf>

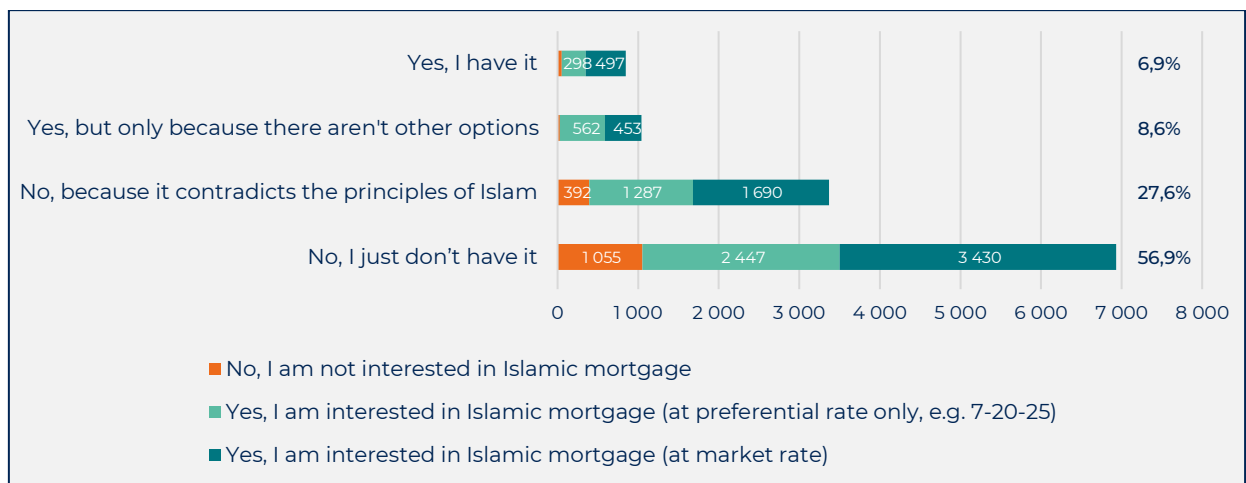
49% of the 265 000 individuals (26,8% of practicing Muslims, adjusted by 0.44) are willing to get Islamic car financing at market rates. That would be around 130 000 individuals who could indeed get Islamic car financing over the period of 3-4 years (i.e. 32 – 43 thousand contracts annually, which is at 20% level of new contracts in 2023). Using the average financing size of 7.5 million KZT, the total amount of new Islamic car financing (unbanked) might reach 975 billion KZT over the 3-4 years (around 244 billion KZT annually).

Another 36% of this group is open to Islamic car financing at preferential rates, however, we will not consider the potential demand at this stage due to no active government program.

5. Islamic mortgage

Questions posed: Do respondents have a conventional mortgage, and would they be interested in an Islamic mortgage alternative?

Like in the previous section (Islamic car financing), we tried to segregate the interest in Islamic mortgage at market rates and at preferential rates (e.g. similar to terms of 7-20-25, 9-20-25 or other government programs). The following diagram elaborates the results.



According to the First Credit Bureau¹¹, as of September 1, 2023:

- There were 520 000 people in Kazakhstan who took out a traditional mortgage.
- Of these, mortgage loans from Otbasny Bank constitute about 63%–65% of the country's total mortgage portfolio.
- Average outstanding mortgage amount – 10,4 million KZT.
- With that, over 25% of new mortgages in 2023 were at market rates (through second-tier banks)¹².

¹¹ <https://www.inform.kz/ru/rabi-ipoteki-ili-vladeltsi-nedvizhimosti-pochemu-v-kazahstane-ne-kazhdiy-mozhet-kupit-kvartiru-Oedac3>

¹² <https://dknews.kz/ru/finansy/303418-ipotechnyy-rynok-kazahstana-v-2023-godu-klyucheveye>

According to the latest information¹³, as of January 1, 2024:

- The total mortgage portfolio in Kazakhstan increased to 5.8 trillion KZT, 61% of these were approved in the last two years.
- New mortgages in 2023 – 116 000 contracts with total of 1.8 trillion KZT (lower by 17-19% vs. 2022).
- Average new mortgage size in 2023 – around 15 million KZT.

Note: *There might be a potential bias in the survey results as it appears that about 348 000 (15,5%) of the practicing Muslims have an existing mortgage, or about 67% of all mortgage holders (520 000) are related to practicing Muslims. Similarly, for the purposes of excluding potential bias, it is suggested to cap this percentage rather at 19,5% (% of practicing Muslims of total population) as it is asset-based borrowing, thus adjusting by the coefficient of 0,29 (= 19,5% / 67%).*

With necessary adjustment, the survey results can be interpreted in the following way:

- 56 000 individuals (8,6% of the practicing Muslim population, adjusted by 0.29) currently have traditional mortgage but due to a lack of Shariah-compliant alternatives. 43% of them are open to refinancing at market rate, other 54% - only at preferential rate (despite conscious preference towards Islamic financing).
- 180 000 individuals (27,6% of the practicing Muslim population, adjusted by 0.29) do not have mortgage due to religious beliefs. Of those, 50% are open to Islamic mortgage at market rates, and other 38% - on preferential terms only.

To calculate the immediate market demand for Islamic mortgage, the following groups are considered:

A. Practicing Muslims with existing mortgage (at market rate) but conscious preference towards Islamic financing.

43% of the 56 000 individuals are willing to refinance via Islamic finance at market rates. The expected Islamic refinancing at market rate is about 250 billion KZT.

B. Practicing Muslims with existing mortgage (at preferential rate) but conscious preference towards Islamic financing.

It is assumed that 54% of the 56 000 individuals have existing mortgage at preferential rate, as they are willing to refinance only at preferential rate. The estimate refinancing with similar preferential terms is about 314 billion KZT.

C. Practicing Muslims without mortgage (market rate) because of religious beliefs.

¹³ https://forbes.kz//economy/finance/ipoteka_avtokreditovanie_i_bankrotstvo_fizlits_itogi_kreditnogo_ryinka_rk_za_2023_god_1/

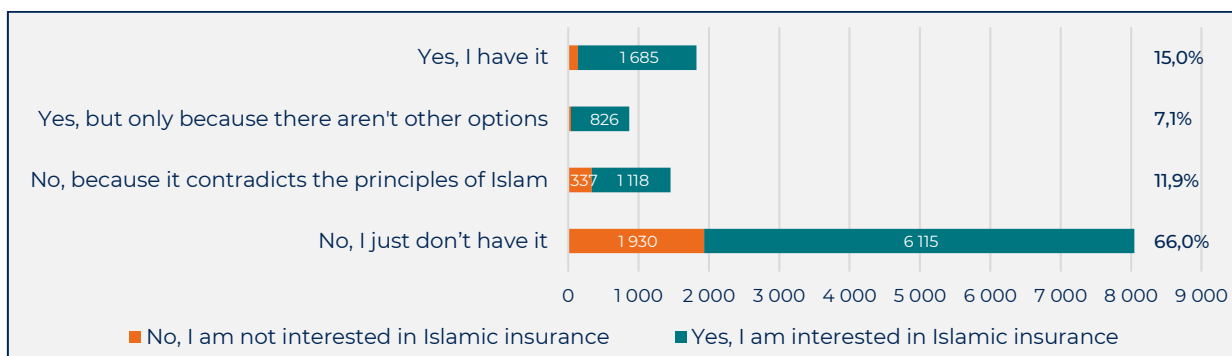
50% of the 180 000 individuals are willing to get Islamic mortgage at market rates. That would be around 90 000 individuals who could indeed get Islamic mortgage over the period over 5-10 years. Using the average financing size of 15 million KZT, the total amount of new Islamic mortgages (unbanked) in the next 5-10 years potentially around 1 350 billion KZT (about 135 billion KZT annually).

D. Practicing Muslims without mortgage (at preferential rate only) because of religious beliefs.

38% of the 180 000 individuals are willing to get Islamic mortgage at preferential rates. That would be around 68 400 individuals who is keen to get Islamic mortgage over the period of 5-10 years. Using the average financing size of 15 million KZT, the total amount of new Islamic mortgages (unbanked) in the next 5-10 years would be around 1 026 billion KZT (103 billion annually).

6. Islamic insurance

Questions posed: Do respondents have a conventional insurance, and would they be interested in using an Islamic insurance alternative?



According to the National Bank¹⁴, the total value of premiums received from insurance contracts, comprising voluntary personal insurance stands at 485 billion as of December 2023. Since there is no data on how many persons have voluntary personal insurance, it is assumed that 19,5% of all premiums are from the practicing Muslims.

To calculate the immediate market demand for Islamic insurance, the following groups are considered:

A. Practicing Muslims with existing insurance policy but with conscious preference towards Islamic insurance.

32% of respondents with voluntary insurance (=7,1% / (15% + 7,1%)) have due to a lack of Shariah-compliant alternatives. Of those, 95% are willing to consider

¹⁴ <https://nationalbank.kz/ru/news/osnovnye-finansovye-pokazateli-strahovogo-rynka/rubrics/2184>

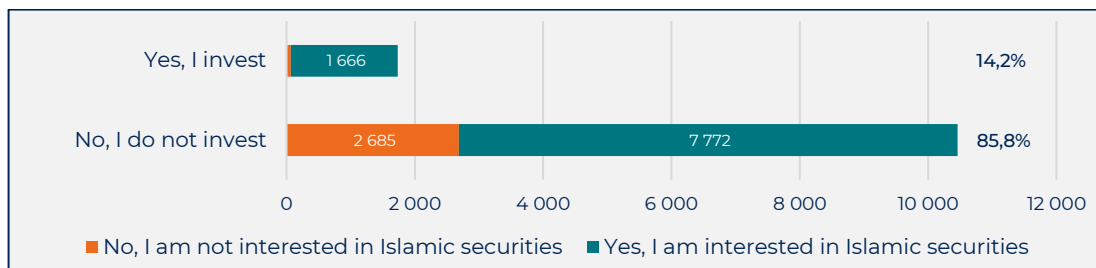
Takaful. The expected switch to Islamic insurance is about 29 billion KZT in premiums.

B. Practicing Muslims without insurance because of religious beliefs.

Number of individuals who do not voluntary personal insurance policy specifically because it contradicts Islamic principles exceeds by about 1.65x of those that have it but have due to a lack of Shariah-compliant alternatives. Among those, 77% are interested in Islamic insurance options, highlighting a substantial market opportunity for Islamic insurance products. The expected premium amount of new Islamic insurance contracts is about 38 billion KZT.

7. Islamic securities

Questions posed: Do respondents invest in securities (stocks, bonds, etc.) on the stock exchange, and would they be interested in investing in Islamic securities (Sukuk, Islamic shares)?



There are two stock exchanges in Kazakhstan: the Kazakhstan Stock Exchange (KASE) in Almaty and Astana International Exchange (AIX) in Astana. The market capitalisation at KASE is USD 59 billion¹⁵, at AIX – USD 62,6 billion¹⁶.

As of Dec 2023, the number of accounts (subaccounts and omnibus accounts) of Kazakhstani individual investors reached 2,4 million accounts at Central Securities Depository (KCSD) system and 1,6 million accounts at AIX Central Securities Depository (AIX CSD). The same individual might have accounts at both stock exchanges, and the same individual might have subaccount and omnibus account through the investment broker. Nevertheless, if we assume there are 2,4 individual investors in Kazakhstan, that would give us about 20% of the total adult population.

The trading volumes (secondary market) at both exchanges in 2023 were as follows:

- Corporate bonds: USD 4 807 million (KASE), USD 452 million (AIX).
- Government securities: USD 17 694 million (KASE), n/a (AIX).
- IFI securities: USD 742 million (KASE), n/a (AIX).

¹⁵ https://kase.kz/files/presentations/ru/24_01_01_KASE_en.pdf

¹⁶ <https://aifc.kz/uploads/%D0%9E%D0%B1%D0%B7%D0%BE%D1%80%20%D1%80%D1%8B%D0%BD%D0%BA%D0%B0%20%D0%BA%D0%B0%D0%BF%D0%B8%D1%82%D0%B0%D0%BB%D0%B0%202023/Capital%20Markets%20Report%20-%20eng.pdf>

According to KASE, individual investors account for 10,9% of corporate bond trades, 1,1% of government securities, and 3,6% of IFI securities. It will be assumed these numbers apply to AIX trades as such information is not available at the point of this research being conducted.

Note: The following categories are excluded due to little evidence of not being Shariah compliant:

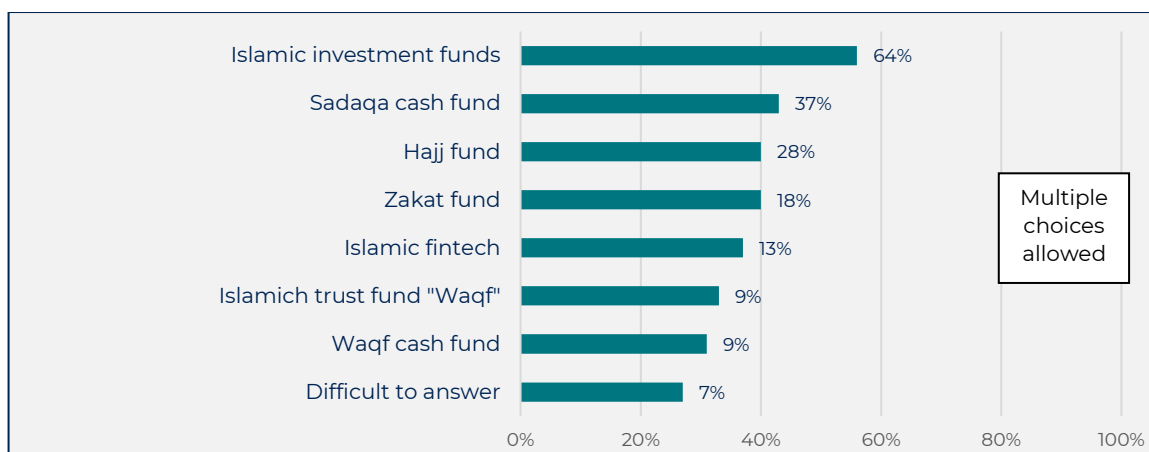
- Equity: trading volume – USD 661 M (KASE) + USD 130 M (AIX), individuals – 42,9%
- KASE Global: trading volume - USD 68,9 M, individuals - 37,8%
- Investment funds: trading volume – USD 31,1 M, individuals – 41% (USD 13 M)

As a result, we get that the individual investors traded the debt instruments for the total amount of KZT 363 billion¹⁷. Assuming there are 2,4 million individual investors, the average trading amount in debt instruments per year is about KZT 151 000 per individual investor.

From the survey, 14,2% of respondents (or 318 800 of practicing Muslims) currently invest in securities. 96% of those (306 000) are interested in Islamic securities. Thus, to calculate the immediate market demand for Islamic securities (sukuk), the expected investment by individual investors is KZT 46 billion per annum.

8. Specific Islamic financial products

The last question on products was asked to gauge interest in a range of Sharia-compliant financial products aimed at guiding Islamic financial institutions in Kazakhstan towards aligning their future offerings with consumer preferences and contributing to the industry's growth.



- Islamic investment funds shall adhere to Islamic principles, avoiding investments in businesses related to usury, alcohol, tobacco, and gambling.
- Sadaqa cash fund facilitates donations to assist the needy on a gratis basis. Together with Zakat fund, these funds focus on charitable giving and obligatory

¹⁷ Average USD exchange rate in 2023 – KZT 456,31 (National Bank of Kazakhstan)

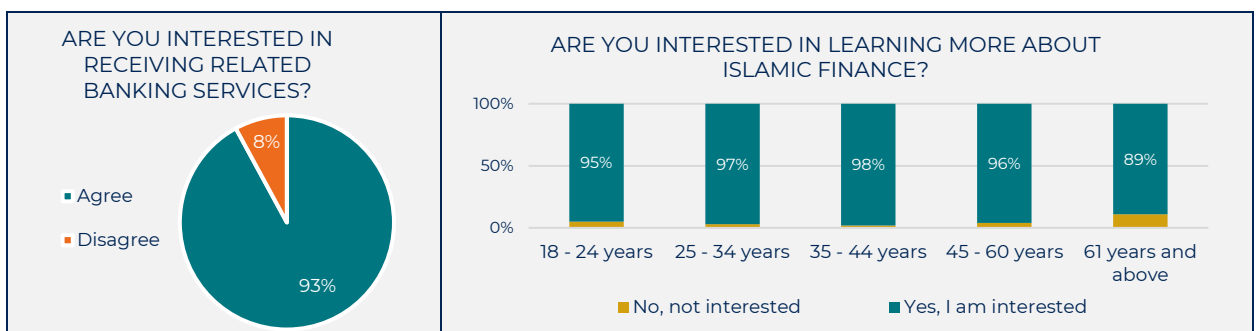
financial deductions for the benefit of the poor, emphasizing the importance of charity and social welfare in Islamic finance.

- Hajj Fund is a savings scheme supports Muslims intending to perform Hajj or Umrah, with investments made in Islam-compliant enterprises to aid in their pilgrimage.
- Zakat Fund handles obligatory financial contributions to support the poor and disadvantaged, adhering to Islamic mandates.
- Islamic trust fund "Waqf" involves holding assets in trust for charitable purposes, supporting institutions like mosques, schools, and hospitals. This shows the significance attributed to long-term charitable endeavors and mechanisms for social financing, indicating their esteemed role within the realm of Islamic finance, despite attracting relatively modest interest.
- Waqf cash fund allows clients to donate to a fund that provides interest-free loans to vulnerable social groups. It underscores the value placed on sustainable charitable efforts and social finance mechanisms within the Islamic finance sector.

9. Other banking services

93% of individuals, namely 11,337 people, expressed interest in receiving banking services such as payments, transfers, currency exchange, etc. Entering the Kazakhstani market, Islamic finance institutions should be aware that local consumers are already familiar with and fond of mobile banking apps that make financial transactions effortless. To truly resonate with and retain this tech-savvy audience, Islamic finance newcomers will need to offer digital banking experiences that are at least on par with, if not better than, what's currently on the market.

97%, or 11,797 individuals, expressed their interest in learning more about Islamic finance. When split by age groups we can see high interest across all age groups around and above 90%.



PART 2:
CORPORATE ISLAMIC FINANCE

2.1 METHODOLOGY

The approach for performing market analysis of the corporate segment is less straightforward as compared to that of the retail segment. Both surveys and interviews were employed in collecting the information.

Not all sources were reliable, so to supplement the available information we conducted a survey of Kazakhstani businesses, owners and/or management of which are practicing Muslims, as well as interviews with Islamic finance professionals, representatives of Islamic associations.

The objectives of the interviews included:

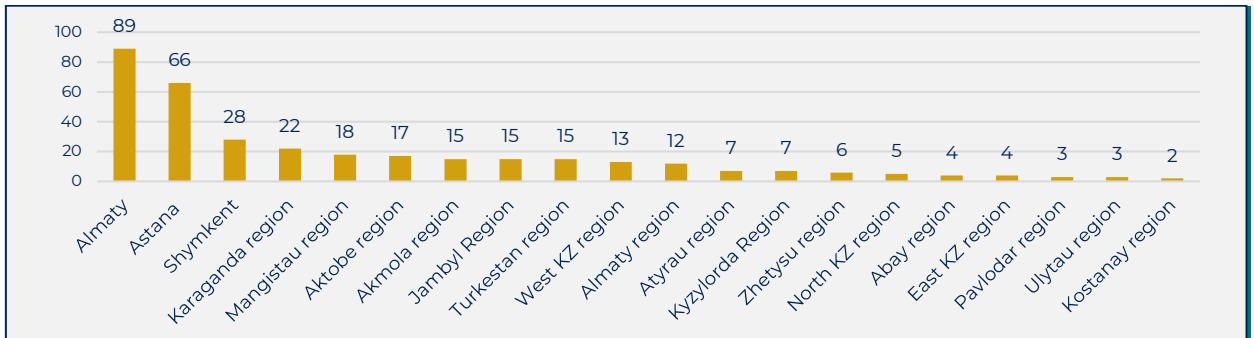
- Identification of specific Islamic financial products and services that are experiencing high demand among corporate customers in Kazakhstan. This includes a wide range of offerings such as banking, nonbanking, Islamic securities, and insurance products.
- Evaluation of the preferences, needs, and expectations of the targeted customer segments. This involves a detailed analysis of various aspects such as the features, benefits, accessibility, and convenience associated with Islamic financial products.
- Identification of the existing barriers and concerns that might hinder the development of corporate Islamic finance.
- Evaluation of the actual demand for Islamic financing of corporate segment.

Although, the corporate bank loan portfolio in Kazakhstan reached 13,1 trillion KZT¹⁸ in December 2023 (21% lower as compared to retail bank loans), we cannot estimate that the market potential for corporate Islamic financing would have similar ratio. And that's because the development of corporate Islamic finance as compared to retail Islamic finance varies from country to country.

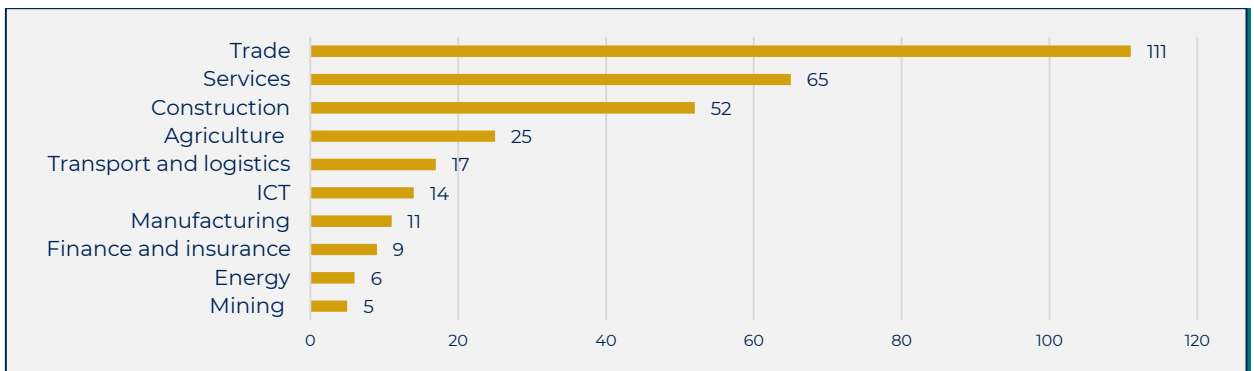
¹⁸ <https://nationalbank.kz/ru/news/kredity-bankovskogo-sektora-ekonomike>

2.2 GENERAL PORTRAIT OF THE RESPONDENTS

A total of 351 companies across Kazakhstan participated in the survey, offering a broad perspective of the business landscape in the region. This dataset reveals significant geographical diversity, with the highest number of respondents located in Almaty and Astana, which had 89 and 66 companies participating respectively.



A diverse array of industries is represented among the companies that participated in the survey (both online and offline).

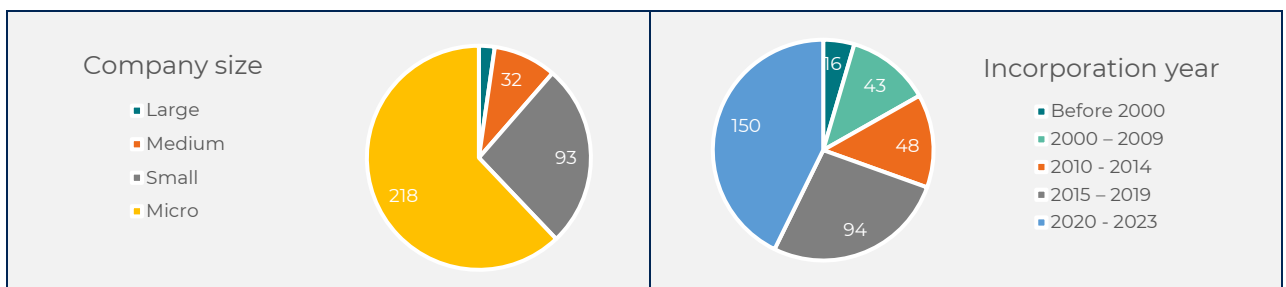


Out of the 351 companies surveyed, the majority fall into the 'Micro' category with 218 companies, the 'Small' category includes 93 companies, the 'Average' category is represented by 32 companies and only 8 companies are classified as 'Large'.

For information:

- *Micro business: annual revenue up to 103,5 million KZT (up \$0,23 M);*
- *Small business: annual revenue between 103,5 million KZT and 1 035 million KZT (\$0,23 – \$2,3 M);*
- *Medium enterprise: annual revenue between 1 035 million KZT and 10 350 million KZT (\$2,3 – \$23 M);*
- *Large enterprise: annual revenue above 10 350 million KZT (above \$23 M).*

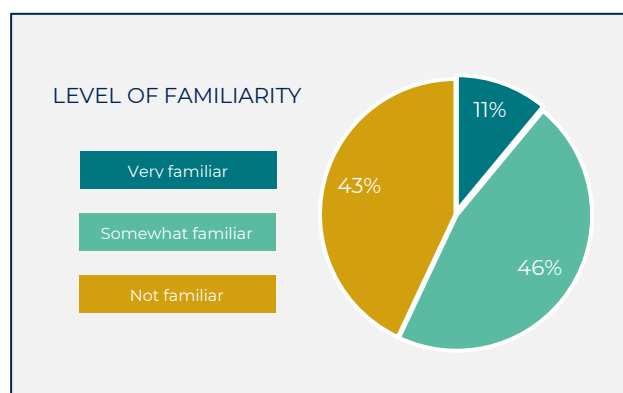
About half of the corporate respondents were incorporated in the last 4 years.



2.3 AWARENESS AND PREFERENCES

Familiarity with Islamic financial products

Among the corporate entities surveyed, approximately 46% report some degree of familiarity with Islamic financial products and services, while 43% admit to not being familiar at all, and a small fraction of 11% describe themselves as very familiar. Interestingly, the survey findings for corporate respondents closely parallel the response patterns observed among individual participants.



This consistent trend across different respondent types pinpoints to a widespread uniform problem which lies in lack of engagement of Islamic finance institutions with the population.

February 2024 marks the 15th anniversary of Kazakhstan's enactment of the Law on Islamic Finance. Despite the establishment of a legal framework for Islamic finance in 2009, the anticipated growth in this sector has not materialized. Currently, the share of Islamic financial services accounts for a mere 0.2% of Kazakhstan's banking sector.

Role of advertising of Islamic financial products

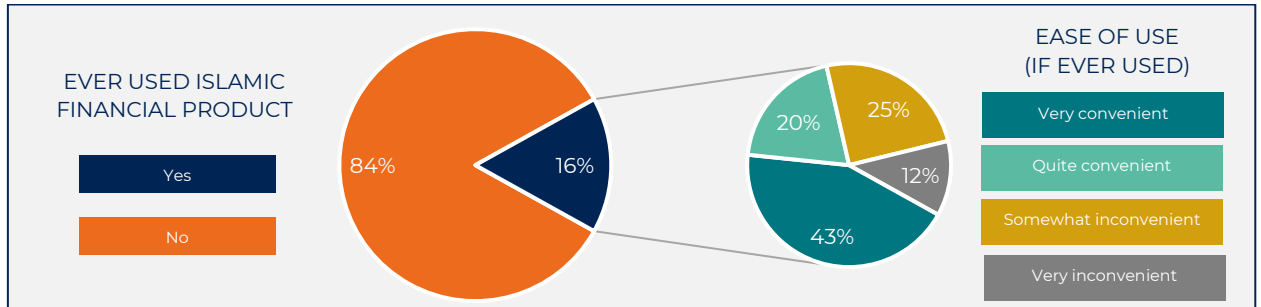
The survey data regarding the potential impact of targeted advertising and promotions on the interest in Islamic banking products shows a substantial inclination among respondents towards being influenced by such marketing efforts. Of those surveyed, a vast majority, 307 respondents affirm that targeted advertising and promotions could pique their interest in Islamic banking products or services or enhance their desire to use them if they are already customers. This accounts for approximately 87% of the total respondents who believe in the persuasive power of targeted marketing. In contrast, only 44 respondents, representing about 13%, feel that advertising and promotions would not influence their interest or usage of Islamic banking products.

Importance of compliance with Islamic principles

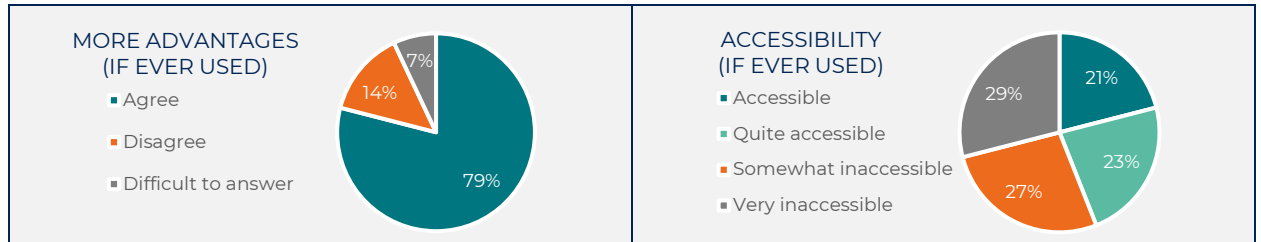
A commanding majority (89%) of respondents consider compliance with Islamic principles to be very important when selecting a financial product. About 9% of found it difficult to answer or did not know, which could imply a lack of understanding of Islamic financial principles, or ambivalence regarding the significance of such compliance in their financial choices.

Use of Islamic financial products

The survey reveals that a mere 16%, constituting 56 corporate respondents, have engaged with Islamic financial products or services. In stark contrast, a significant 84%, totaling 295 corporate respondents, have not used any Islamic financial products, citing diverse reasons. Among those who have availed Islamic financial products, the convenience level is at 63%.

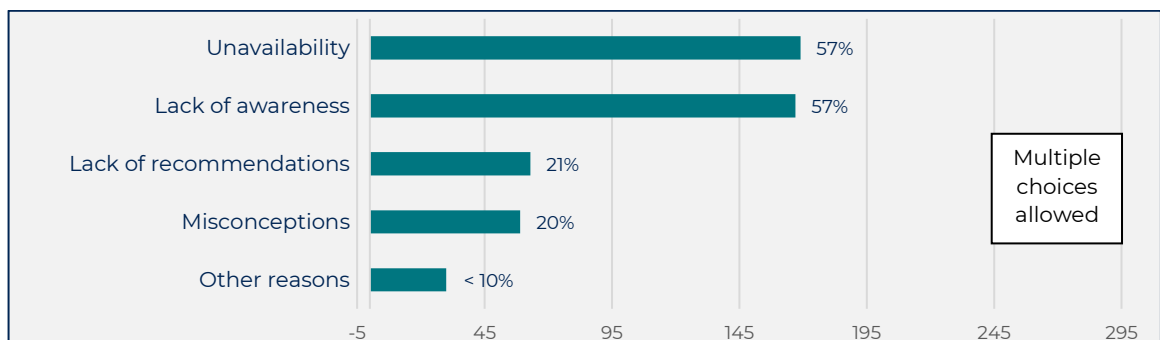


Among the 56 corporate respondents with experience in Islamic financial products, a targeted inquiry was conducted to evaluate their opinions on the comparative advantages of these products against conventional ones. The findings reveal that 79% of them affirm that Islamic financial products present more advantages compared to their conventional counterparts. However, at the same time, combined 56% of respondents face some level of inaccessibility, indicating that certain Islamic financial products are not widely available. While there are providers offering such products in the market, the overall volume of offerings is not extensive.



Reasons preventing the use of Islamic financial products

Those who have not used Islamic financial products, representing a weighty number of 296 respondents (84% of total), cited the following reasons:



Key takeaways from these responses:

1. [*Unavailability*] Availability ranks highest, pointing to the scarcity not only of Islamic financial institutions but also lack of their branches throughout Kazakhstan. Additionally, there is a limited range of product offerings available.
2. [*Lack of awareness, misconceptions*] Another primary obstacle identified is a significant scarcity of information, revealing a vast potential user base that remains untapped due to informational deficits about Islamic financial principles. One-fifth of the respondents also have some misconceptions about Islamic finance.
3. [*Lack of recommendations*] Trust is a cornerstone in finance. And transparency is a cornerstone in fostering trust. Islamic financial institutions should strive to be transparent by openly sharing information about their operations, policies, decision-making processes, compliance with the regulations. And then through excellent client services and product offerings, the financial institutions can attract more customers through word-of-mouth.

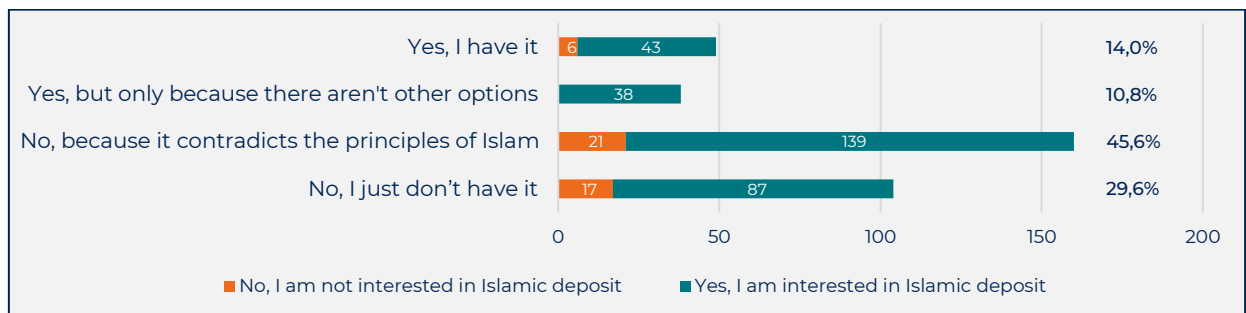
2.4 MARKET DEMAND

We applied a similar methodology as employed with individuals to scrutinize the complex dynamics of banking relationships among corporate respondents, concentrating on their involvement with conventional and Islamic financial products. Participants were presented with specific questions concerning their utilization of various conventional banking services, and their responses were methodically categorized into four distinct groups. Furthermore, alternatives from Islamic finance were introduced after each inquiry about conventional products to evaluate interest. This approach yielded valuable insights into both the existing banking relationships and the potential receptiveness to Islamic financial products among practicing Muslims in Kazakhstan within the corporate sector.

Due to the absence of statistics on the number of businesses owned by practicing Muslims and subsequently there is no percentage proportion for them, the same methodology employed with individuals might not be applicable in estimating the market demand for corporate Islamic finance. However, we conducted interviews with the heads of "Association of Halal Industry of Kazakhstan" (AHIK), representing 700 domestic and 50 international companies, and the Consortium of Islamic Developers of Astana city, providing additional insights into the market landscape.

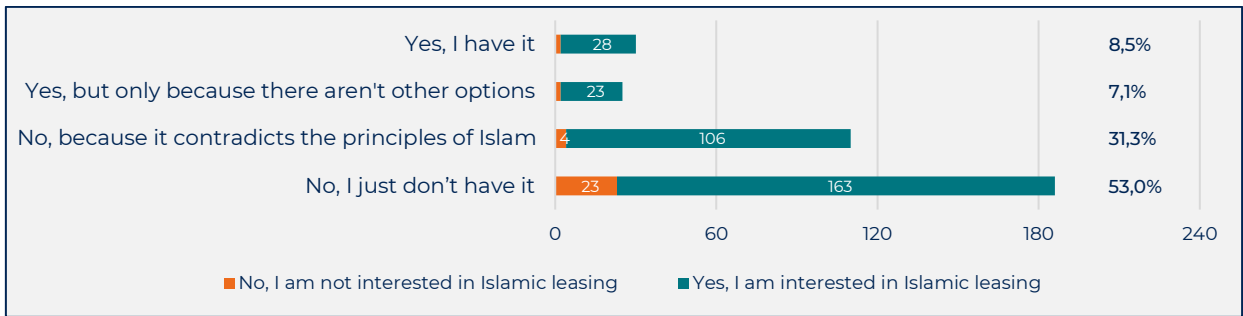
Conventional financial products and preference in Islamic financial products

A) Questions posed: Do corporate respondents currently utilize conventional deposit, and would they be interested in Islamic deposit?



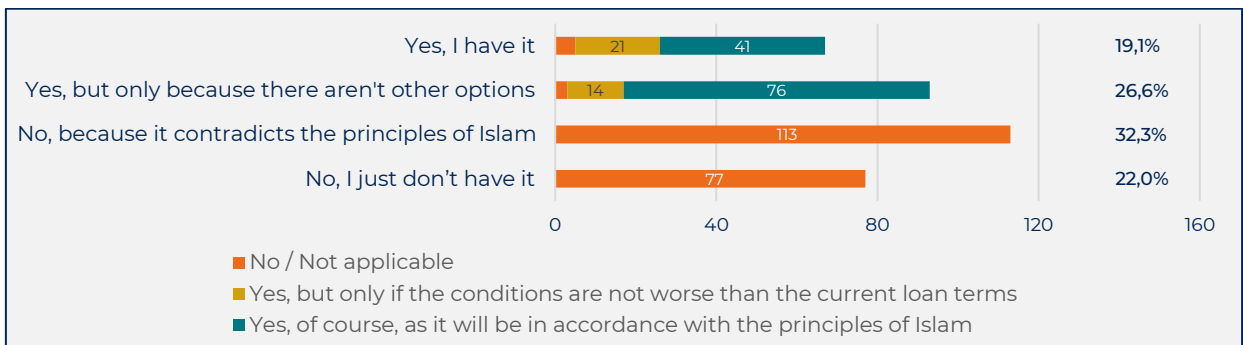
- About 25% of the surveyed companies have deposits. Among the companies from trade, services, agriculture and construction – this number drops to 20%, while for companies from other industries – it increases to 34%.
- Another 46% abstain from opening the conventional deposits as it contradicts the principles of Islam. This number increases to 58% for the western regions of Kazakhstan, but drops to about 40% for Astana and Almaty cities.
- 30% of respondents do not have deposits without any specific reason. This number does not change across the industries.

B) Questions posed: Are survey participants currently utilizing financial leasing, and do they express interest in Islamic financial leasing?

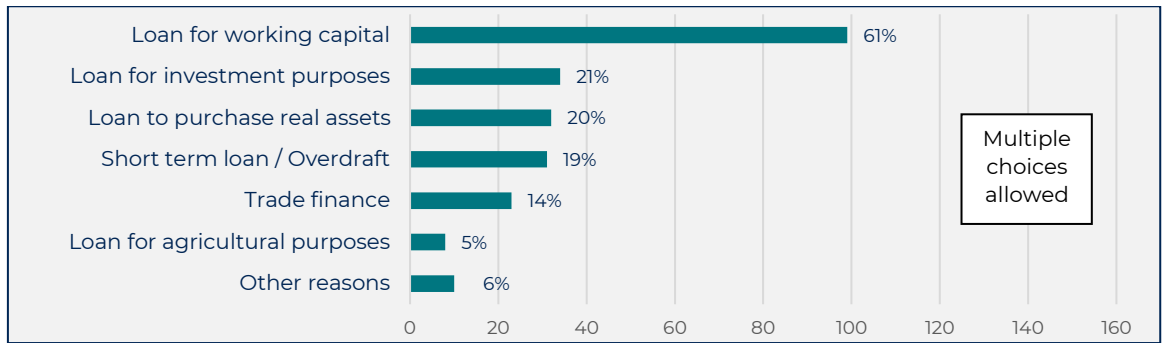


- Over 15% of respondents utilize conventional financial leasing. Among the companies from trade, services, agriculture and construction – this number drops to 12%, while for companies from other industries – it increases to 26%.
- Another 31% do not have financial leasing due to religious belief. Within those, over 85% are interested in Islamic leasing.
- More than half of the respondents do not use leasing product without specific reason.

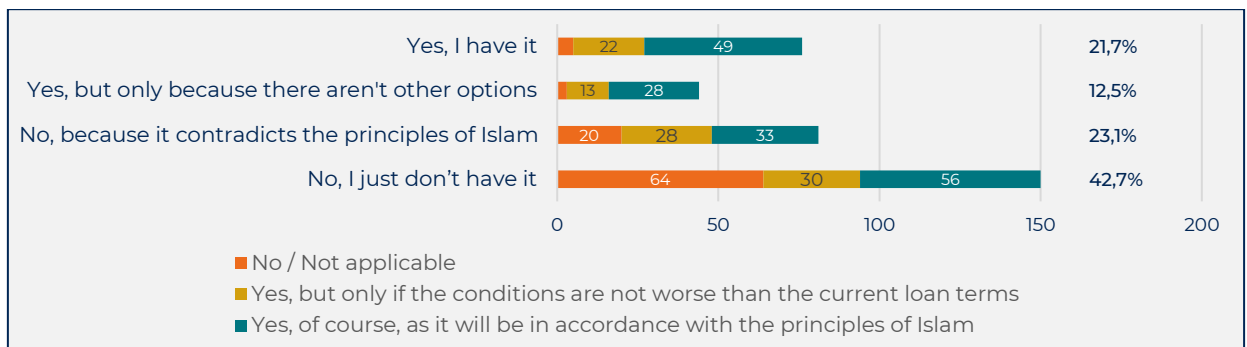
C) Questions posed: Do survey participants currently have a bank loans, and would they express interest in refinancing their current loans in the Islamic finance company or bank?



- 54% of the respondents do not have any bank loans, about 60% of those (32,3% of total) abstain from loans due to religious belief.
- 46% of respondents utilize bank loans, over 70% of which (33% of total) are interested in Islamic financing and represent real / immediate demand. 10% of respondents utilize bank loans and will consider Shariah-compliant refinancing only with conditions not worse than the existing one.
- Respondents with current bank loans were asked the purpose of those loans. The diagram below provides an indication of the respondent's preferences for different types of loans, with a strong emphasis on working capital with 61% of respondents currently having this type of loan, followed by loans for investment purposes, loans for the purchase of real estate, short-term loans, trade finance and other.

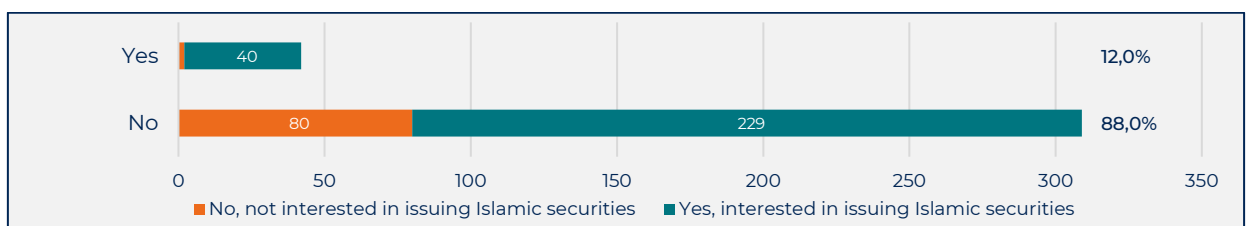


D) **Questions posed:** Do respondents have a conventional insurance, and would they be interested in using an Islamic insurance alternative?



- Over third of respondents have conventional insurance policy, with over 60% of which (22% of total) are interested in Islamic insurance (takaful) and represent real demand. 10% of respondents utilize conventional insurance and will consider Shariah-compliant insurance only if the conditions are not worse off.
- About two-thirds of the respondents do not have any insurance, about 60% of those (32,3% of total) abstain from insurance due to religious belief.

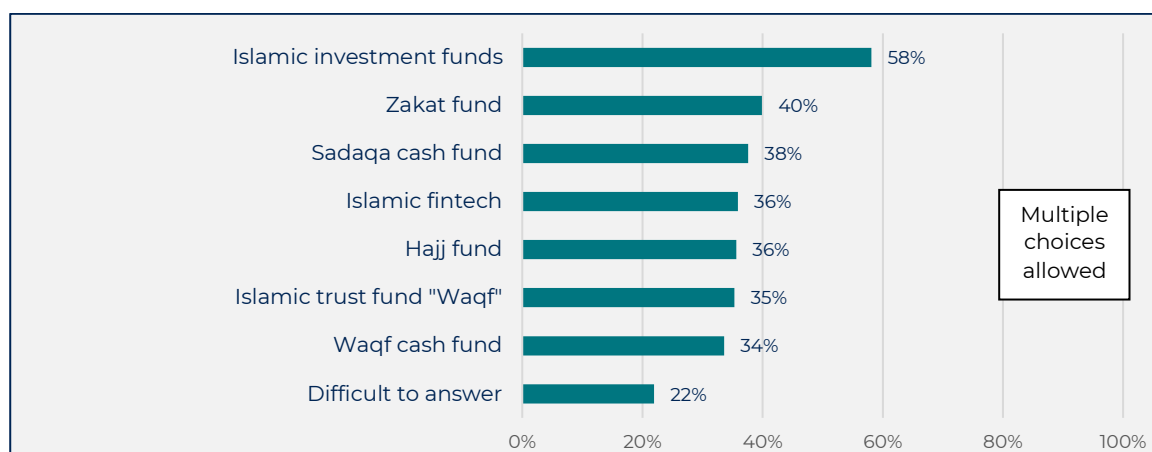
E) **Questions posed:** Do respondents raise fund through bond issuance, and would they be interested in issuing Islamic securities (sukuk)?



- Fund-raising with the help of conventional securities: Out of the total 351 companies surveyed, 42 (12%) currently raise funds via bond issuance. Within this group, a significant majority, 40 corporate respondents (95%), are interested in the possibility of raising funds through issuance of Islamic securities such as Sukuk. These companies are distributed across the industries and regions.

F) Other questions:

- 95% of the respondents showed their interest in receiving related banking services (payments, transfers, currency exchange) if they were a client of an Islamic bank.
- Almost all (99%) have expressed an interest in learning more about Islamic finance.
- The last question was asked to gauge interest in a range of other Sharia-compliant financial products:



Estimated market demand

Despite the limited availability of data, the survey respondents and the interviewees point to the same products.

According to the existing Islamic financial institutions, the **current market demand by the corporate segment exceeds KZT 760 billion annually**. According to the interview results, the abovementioned demand is not met due to shortage of corresponding financing.

Currently, three most popular and more developed Islamic finance instruments in Kazakhstan are Murabaha (Commodity Murabaha), Mudarabah, and Ijara, with over 90% of the indicated market demand are through the instruments of Murabaha and Ijara.

The top industries that represent the clients and the potential clients of the existing Islamic financial institutions are Trade, Construction, Transport and logistics, Agriculture and Mining. It was also indicated that Tourism (Hajj) related Islamic finance instruments are gaining more interest. One has to note that the Services category is not in this list despite it being the second most popular industry which the survey respondents belong to, so there is probably undefined and unmet demand as well.

AUTHORS OF THE REPORT

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AIFC Authority



DANIYAR KELBETOV

Chief Product Officer

Daniyar oversees industry analysis, product development, and legal development. His previous work experience includes positions in risk management, structuring, and private equity at Citibank Singapore, Citi Private Bank, Kazakhstan Development Bank, National Investment Corporation of the National Bank of Kazakhstan.



MADINA TUKULOVA

Head of Islamic Finance

Madina has been developing and promoting Islamic finance in Kazakhstan and the Central Asian region for more than fifteen years. She was included in the Cambridge IFA ranking of "The 30 Most Influential Women in Islamic Finance and Business", and she was recognised as Womani Influencer for the year 2023.

CSQLaw



SHAMSUL QAMAR

Managing Partner

Shamsul Qamar is also a member of Malaysian Bar since 2007 and a qualified company secretary pursuant to Malaysian Companies Act 2016. Shamsul has extensive corporate and international legal experience. He began his international project as a consultant of Islamic Development Bank (IsDB) for Islamic banking and finance law in Kazakhstan in 2008 and Tajikistan in 2013. He is actively involved in Central Asia region since then and led the setting up of CSQlaw first international office under AIFC in 2019.



MADZLAN HUSSAIN

Senior Partner

Madzlan advises on Islamic finance, capital markets practices, as well as corporate and debt restructurings throughout his career of more than a quarter-century. For his expertise, he was recognized as a leading Islamic finance lawyer in various publications including Legal 500, IFLR 1000, Chambers & Partners, Who's Who Legal, Expert Guide and Islamic Finance News.



DIYAS MOLDABAYEV

Chief Executive Officer, Kazakhstan branch

Diyas is a seasoned professional in Islamic Finance, holding an Associate Qualification in Islamic Finance from the IBFIM (Malaysia). He is also a distinguished member of the Association of Islamic Finance Professionals of Kazakhstan (AIFP) and Russian Association of Experts in Islamic finance (RAEIF).