

KYRGYZSTAN



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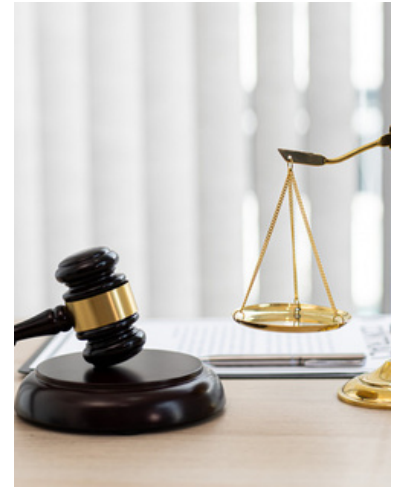
BUSINESS LAW **NEWS DIGEST**

Issue 9

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1. THE KYRGYZ REPUBLIC ADOPTS NEW LAW "ON COMBATING CORRUPTION"

On 15 January 2026, the Law of the Kyrgyz Republic "On Combating Corruption" has been adopted. The law aims to improve the legal and organizational framework for anti-corruption policy and implement the provisions of the Decree of the President of the Kyrgyz Republic "On the State Strategy for Combating Corruption in the Kyrgyz Republic for 2025–2030" dated 5 June 2024, No. 137.



The law establishes an updated regulatory framework for anti-corruption policy, eliminating previously existing ambiguities and duplication of provisions. Clear definitions of key terms and the scope of regulation are of particular importance, as they reduce the risk of arbitrary interpretation and abuse in law enforcement practice. Another important innovation is the consolidation of institutional mechanisms for recording corruption crimes and conflict-of-interest-related offences in dedicated registries.

For businesses, the Law introduces enhanced requirements for internal compliance procedures, conflict-of-interest management, and interaction with government authorities. Legal entities may face increased scrutiny from authorized bodies with respect to the prevention of corruption risks.

Overall, the Law also aims to increase transparency in the activities of state and municipal authorities and to strengthen mechanisms for responding to corruption.

2. AMENDMENTS TO THE RULES FOR REGISTRATION AND SAFETY ASSESSMENT OF MEDICAL DEVICES HAVE ENTERED INTO FORCE IN THE EAEU

Amendments to the rules for registration and safety assessment of medical devices, approved by Decision No. 50 of the Eurasian Economic Commission (EEC) Council dated 8 July 2025, entered into force in the Eurasian Economic Union (EAEU) on 24 February 2026.

The amendments are aimed at tightening requirements for the entry of medical devices (medical products and medical equipment) into the EAEU market and affect both registration procedures, the terminology and classification framework for regulation.

EEC Council Decision No. 50 significantly revises the approach to devices in low and first medium risk classes (1 and 2a). While simplified procedures were previously in effect for such devices, clinical trials are now a mandatory element of the registration dossier. This brings EAEU regulations closer to international standards for assessing the safety and efficacy of medical devices.

Additionally, a clear process for including new types of products in the EAEU nomenclature has been established, eliminating legal uncertainty when registering innovative products.



Key changes include :

- ***Clinical Trials***

Previous relaxations for risk class 1 and 2a devices have been eliminated. All relevant medical devices require clinical trials in accordance with the established procedure.

- ***EAEU Nomenclature of Medical Devices***

If the applied-for device is not included in the current nomenclature, the reference body is required to initiate the procedure for its inclusion and notify the applicant. Registration without resolving the nomenclature classification issue is not permitted.

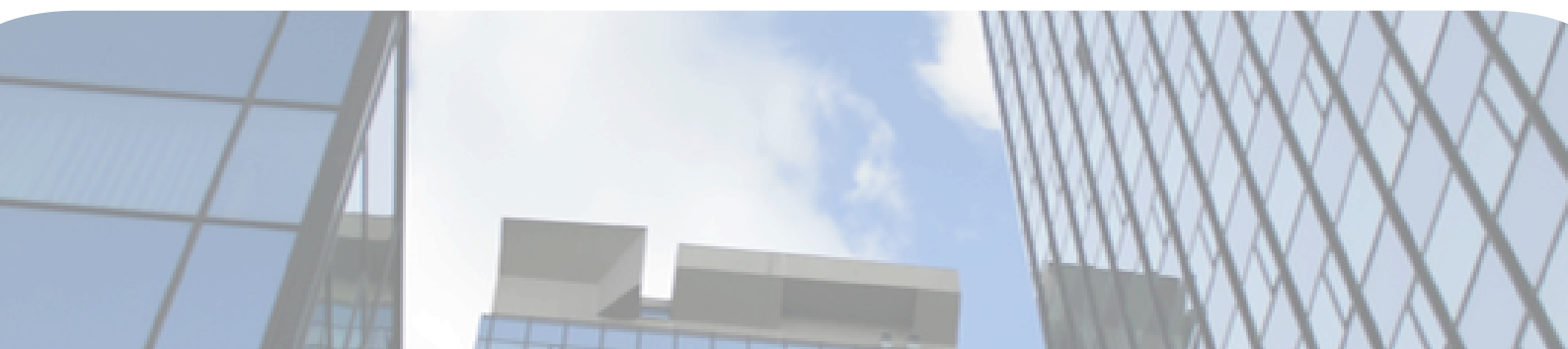
- ***Terminology***

Terminology has been brought into line with IMDRF international standards. Specifically, the term "adverse events (incidents)" has been replaced by the term "accidents," which impacts post-registration monitoring and reporting requirements.

- ***Clarification of Wording***

The definitions of "model (brand)," "applicability," and "processing" have been updated to eliminate ambiguities during examination and registration.

For manufacturers and distributors of medical devices, these changes mean increased registration timelines and costs, especially for products previously classified as low-risk. High-quality clinical documentation and correct product classification are becoming increasingly important. Companies working with innovative or combination products must account for the additional time required to include their product in the EAEU nomenclature, which may impact their market entry.



3. KYRGYZSTAN UPDATES NOTARIAL REGULATIONS

On 19 February 2026, the Cabinet of Ministers of the Kyrgyz Republic approved amendments to the notarial regulations in the country by Resolution No. 121.

The changes affect the procedure for paying state fees, the execution of notarial acts, remote procedures, the institution of a notarial order, as well as requirements for notarial offices and licensing.



Digitalization of Payments and Document Management

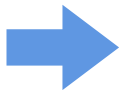
Now, the state fee is paid for each notarial act exclusively through a payment platform integrated into the Unified Notary Information System (UIISN) on the day of the notarial act.

Payment is recorded in the UIISN; the inclusion of paper receipts in the registry of registrations and notarial acts is no longer required. Furthermore, the text of the certification inscription must be generated exclusively through the UIISN.

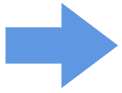


It is established that certain transactions may be concluded exclusively with the personal participation of the parties, without representatives:

- marriage contracts;
- surrogacy agreements;
- agreements on the transfer of a child to a foster family;
- lifetime maintenance/permanent annuity agreements;
- alimony agreements;
- agreements on the exercise of parental rights.



A new rule has been introduced: a notary public accepts an application to terminate a pledge based on notification from the pledgee or their representative for the subsequent lifting of the prohibition on alienation of the property.



The resolution details the lists of documents required for issuing a notarial order on various grounds, including:

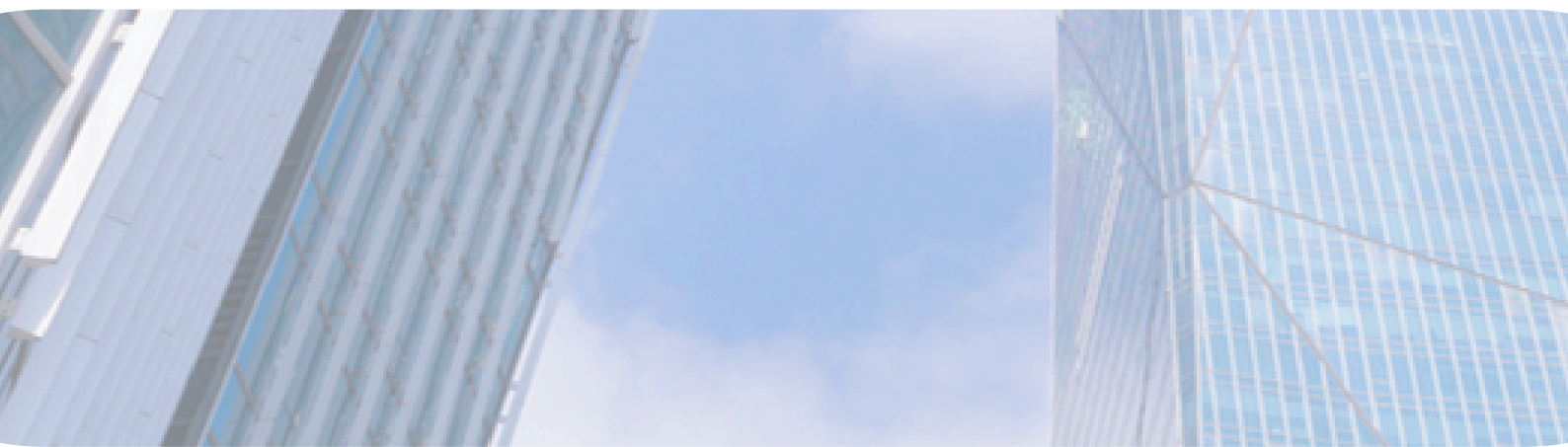
- claims based on a notarized transaction;
- transactions in simple written form;
- promissory note protests;
- alimony collection;
- collection of arrears of mandatory payments (except taxes and insurance premiums);
- collection of accrued but unpaid wages.

It is also possible to send a copy of the notarial order to the debtor not only by mail but also electronically (PDF document by email, WhatsApp, Telegram, and other messaging apps).



It is also established that the remote procedure applies to notarial acts not related to the alienation of real estate, thereby maintaining a heightened level of control over the circulation of real estate assets.

Thus, the changes are aimed at increasing transparency, digitalization, and standardization of notarial procedures, consistent with the trend toward modernizing the legal infrastructure and reducing administrative barriers for businesses.



4. INFORMATION ON THE TAMCHY SPECIAL FINANCIAL INVESTMENT TERRITORY (“TAMCHY” SFIT)

The Tamchy Special Financial Investment Territory (“Tamchy” SFIT) was established by the Law of the Kyrgyz Republic "On the Tamchy Special Financial Investment Territory" dated 19 June 2025, No. 136 (hereinafter referred to as the Law) and has independent legal status. The legal regime of the territory is determined by both the Law itself and a system of special regulations ensuring its autonomous regulation.

The creation of the “Tamchy” SFIT is aimed at achieving the strategic economic development objectives of the Kyrgyz Republic, which include attracting domestic and foreign investment, creating a favorable investment climate, providing additional guarantees for the protection of the rights and legitimate interests of investors, and stimulating the development of production facilities, transport infrastructure, and the tourism and health resort industries. Individuals and legal entities, including foreign investors, can obtain the status of a subject of the “Tamchy” SFIT upon registration in the region and licensing in accordance with the procedure established by the management company. This admission mechanism ensures oversight of ongoing activities and creates a predictable legal environment for the implementation of investment projects.

Below are the key aspects of the legal regime of the “Tamchy” SFIT that are important for potential investors and the professional community.

Autonomous Governance System

The territory's functioning is ensured through a specialized institutional structure: the Management Council (Council), the management company, the registrar, the financial regulator, and the International Center for Dispute Resolution (ICDR).

Special Legal Regime and Regulatory Priority

The acts of the “Tamchy” SFIT are considered normative legal acts. In the event of a conflict between the Law on the “Tamchy” SFIT and other laws and codes of the Kyrgyz Republic, the special Law takes precedence. Furthermore, interference by state bodies and local governments in the territory's activities is expressly prohibited.

International Legal Component

Dispute resolution is envisaged based on English law and the common law system. For this purpose, an independent international dispute resolution center is being established, significantly increasing the predictability of law enforcement for foreign investors.

Regimes and Benefits

Special legal, customs, currency, and visa regimes apply in the territory. Key incentives for residents:

- exemption from all types of taxes for 49 years;
- free customs zone regime without duties and fees;
- free circulation of foreign currencies and virtual assets;
- simplified visa regime for investors, employees, and their family members for up to 5 years, renewable;
- the ability to attract foreign labor without obtaining additional permits.

The combination of tax, currency, and migration preferences creates one of the most liberal investment regimes in the region.

Permitted activities for “Tamchy” SFIT entities:

- SFIT is focused primarily on the financial and investment sector and related services. Permitted activities include:
 - banking, investment, insurance, and reinsurance activities;
 - operations in financial, stock, commodity, and virtual asset markets;
 - asset management, investment and pension fund activities, project and corporate finance, including Islamic finance;
 - brokerage and financial consulting;

- creation and administration of holding structures and trusts;
- professional services (audit, accounting, taxation, consulting, legal support);
- tourism, event management, and healthcare services;
- casino operations and other gambling businesses;
- other commercial activities not prohibited by Kyrgyz Republic legislation.

Residents of the “Tamchy” SFIT are subject to a restricted list of activities prohibited both within and outside the zone. Specifically, restrictions apply to the following areas:

- exploration and extraction of minerals;
- production and trafficking of weapons, ammunition, and explosives;
- activities involving radioactive, nuclear, and other hazardous materials;
- trafficking of narcotic and psychotropic substances (except for the legal import of precursors for industrial purposes);
- production of alcohol and tobacco products, as well as fuels and lubricants.

Therefore, the “Tamchy” SFIT is establishing a special legal regime within the Kyrgyz Republic, prioritizing specialized regulation and utilizing certain instruments characteristic of the common law system. This structure is aimed at ensuring transparent business conditions, institutional guarantees for the protection of investor rights, and increased sustainability of investment projects.

GLOBAL PRESENCE



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