



Securities and Exchange
Commission of Pakistan

JOURNEY TO AN **INSURED PAKISTAN**

FIVE-YEAR STRATEGIC PLAN



Preamble

Securities and Exchange Commission of Pakistan (SECP) conducted a review of the international practices of insurance supervisors and regulators which affirmed the fact that regulators around the world have formulated long term strategic direction for achievement of ultimate vision for any industry or sector. Realizing the importance of having long term vision with a clear strategic direction, the Insurance Division in March 2023, started to work on the strategic direction for insurance industry of Pakistan with an aim of strengthening the three pillars of the entire insurance ecosystem i.e. policyholders, insurance providers and development of insurance intermediaries.

In order to adopt an inclusive approach and to create a shared strategic direction with buy-in of all stakeholders, SECP's team conducted an offsite visit to the insurance industry in June 2023. Meetings with industry experts were held to provide an overview of the draft strategic direction and foster an open, collaborative environment where the regulator listens to stakeholders, encourages their participation, and collaborates to shape the future of the insurance industry.

The visit and interactions with industry experts with diverse backgrounds proved quite fruitful as it provided SECP with insights into the issues faced by the insurance sector through the lens of stakeholders with practical experience. The visit also shed light on practical issues faced by regulatees upon the introduction or amendment of legislation, suggesting a way forward to bridge the gap and facilitate regulatory compliance. The Division also review the earlier reports prepared internally and externally including Insurance Sector Reform Committee Report. Based on industry feedback, the draft strategic direction for the Insurance Division's next five years was amended and named "Journey to an Insured Pakistan."

To develop an industry-wide consensus on 'Journey to an Insured Pakistan' through an inclusive and collaborative approach, SECP convened a roundtable discussion in Karachi in August 2023. Top executives from Pakistan's insurance companies, including CEOs and board members, participated. The primary objective of the roundtable was to foster a collective industry perspective on the future trajectory of Pakistan's insurance sector.

During the discussion and feedback session, input was collected from each participant effectively. The Commissioner of Insurance personally addressed specific questions and concerns raised by participants. The Commissioner stressed the importance of industry collaboration with the regulator to achieve the strategic plan and encouraged industry leaders to take the lead on crucial agenda items. The participants emphasized several key areas during the session, including the imposition of sales tax on life insurance and reinsurance business, the unavailability of reinsurance, the establishment of an insurance pool, facilitating digital distribution, regulatory impact analysis, complaint analysis, nationwide awareness campaigns, and human resource capacity building.

In response to industry feedback gathered during the roundtable discussion, the five-year strategic plan, "Journey to an Insured Pakistan", has undergone additional refinement. The final plan was again shared with CEOs and shareholder representatives. Furthermore, SECP plans to unveil this five-year strategic plan during the International Insureimpact Conference 2023 (IIC 2023), scheduled for December 2023. The goal of launching the plan during a dedicated session of the conference is to encourage further deliberation from the insurance industry players and engage with industry experts and practitioners. Further details of the plan are provided in the subsequent document.

Five Year Strategic Plan



Theme

Journey to an Insured Pakistan



Vision

Inclusive, innovative and sound insurance sector by 2028



Mission

Develop and regulate insurance sector by balancing protection of policyholders with industry growth through regulatory excellence

Targeted Outcomes of Five-Year Plan

Through the plan, SECP expects to achieve following operational and strategic outcomes:

Operational Outcomes

- Elevate the Individual lives covered under individual life policies to greater than 15 Million
- Enhance the Insurance Penetration Rate from current rate of 0.87% to 1.5%
- Increase in Takaful contribution to more than 30%
- Expand the coverage of Motor Third-Party (MTP) Insurance to encompass more than 20%
- Raise the Local Retention to exceed more than 60%
- Augment the digital distribution channel's market share to surpass 5%
- Foster the growth of private health insurance premiums to represent more than 15% of the total premium
- Facilitate the availability of agriculture insurance for non-loanee farmers
- Promote the introduction of disaster insurance products.
- Facilitate availability of annuity products for VPS investors / individual retirees

Strategic Outcomes

- Achieve premium growth from Rs. 553 billion to Rs. 1,221 billion by the year 2028.
- Effectively lower the overall cost associated with regulatory compliances.
- Substantially reduce the ratio of customer complaints.
- Successfully implement Risk-Based Capital (RBC)
- Successfully implementation of International Financial Reporting Standards 17 (IFRS-17)
- Amended Insurance Ordinance
- Settlement of Sales Tax issue
- Digitalized regulatory approvals

Key Priorities

To achieve the targeted outcomes of the five-year plan, SECP has identified the following key priorities and formulated comprehensive operational approaches across following key domains

Key Priority Areas	Operational Approach
Ease of Doing Business	<ul style="list-style-type: none"> • Rationalization of: <ul style="list-style-type: none"> ○ Regulatory Returns ○ Regulatory approvals ○ Licensing requirements ○ Solvency Limits • Review of Management Expense Limits
Legislation Modernization	<ul style="list-style-type: none"> • Insurance Ordinance amendments Bill Finalization • Amendments in Motor Third Vehicles Act 1939 regarding third party insurance
Facilitate Access to Capital and Reinsurance	<ul style="list-style-type: none"> • Encouragement of listing • Enabling the raising of subordinated debt • Facilitate raising of alternative capital-ILS • Review of existing paid up capital requirement • Facilitate creation of Insurance pool • Optimization of reinsurance capacity • Public sector insurers capacity building • Efficient reconciliation mechanism for co-insurance/re-insurance • Facilitate industry for re-insurance arrangements
Policy Holders Protection and Market Conduct	<ul style="list-style-type: none"> • Standardization of retail products policy document • Simplification of Illustrative directive • Transparent complaint handling • Introduction of minimum service standards • Implementation of uniform certification requirements for insurance agents • Review of certification requirements for insurance surveyor • Review of conduct requirement of insurance Surveyors and brokers
Financial Stability and Risk Based Supervision	<ul style="list-style-type: none"> • Implementation of IFRS-17 • Implementation of RBC Regime • Risk based surveillance and inspection
Innovation, Digitalization and Access to Data	<ul style="list-style-type: none"> • Regulatory Sand Box • Launch of motor insurance repository • Launch of insurance policy finder • Enhance scope of life / non-life insurance repository • Availability of all consumer insurance products at EMLAAK

<p>Enhanced Scope and Implementation of Mandatory Insurances</p>	<ul style="list-style-type: none"> • Amendments in Motor Third Party Ordinance 1939 • Amendments in provincial laws regarding compulsory Group Life & Health insurance • Engagement for implementation of Motor Third Party Insurance
<p>Support Availability and Take-up of Takaful, Inclusive, Disaster and Agriculture Insurance</p>	<ul style="list-style-type: none"> • Facilitate registration of new digital/micro-insurers and Takaful Operators • Reports on Inclusive and Agriculture Insurance • Introduction of MGA/TSP Regime (Retail products) • Facilitate takaful companies for re-takaful arrangements
<p>Advocacy and Engagement with Stakeholders</p>	<ul style="list-style-type: none"> • Regular engagement with stakeholders for achieving the objective of the five-year plan • Interaction with taxation authorities to resolve taxation issues • Regular roundtables with IAP, insurtech, digital intermediary/web aggregators, microfinance players • Collaboration with fund management industry for VPS and annuity market
<p>Awareness and Image Building</p>	<ul style="list-style-type: none"> • Innovation fund for insurance awareness • Takaful specific awareness • Data publication
<p>Capacity Building</p>	<ul style="list-style-type: none"> • Energize role of Insurance Association of Pakistan • Facilitate capacity building and training of SECP regarding actuarial skills through coordination with PSOA, IFOA, SOA, international regulators and agencies

Action Matrix

Sr. No.	Action	Effort/Activity	Output	Primary Responsibility / Stakeholders	Secondary Responsibility / Stakeholders	Target Completion Date	Current Status
1	Insurance Ordinance (Amendment) Bill finalization	Follow up with Ministry of Finance for finalization of Insurance Ordinance (Amendment) Bill.	Insurance Ordinance (Amendment) Bill approved by the Parliament.	MOF / SECP	MOC	31-Dec-24	
2	Amendments in Motor Vehicles Act 1939	Follow-up with ministry for finalization of proposed amendments in Motor Vehicles Act 1939.	Approval of Motor Third Party Amendment Bill by the Parliament.	MOF	MOC	31-Dec-24	
3	Report on Motor Third Party Insurance.	Preparation of report on Motor Third Party insurance for onward implementation of proposed recommendations.	Publication of report on Status of Motor Third Party Insurance in Pakistan.	SECP	IAP	30-Sep-23	Report published on July 31, 2023.
4	Implementation of Motor Third Party insurance.	Engagement with concerned law enforcement agencies for implementation of Motor Third Party insurance.	Engagement with concerned law enforcement agencies for implementation of Motor Third Party insurance.	Provincial Motor Registration Authorities	SECP	30-Dec-25	Letters written to all registration authorities.
5	Insurance Sector Ministerial Reporting.	Policy advocacy and engagement with the relevant ministries for placement of insurance under MoF.	Placement of insurance with the ministry of finance for centralized oversight	MOF / MOC	SECP	31-Dec-24	
6	Automation of regulatory approval process through LEAP.	Timely provision of data / active engagement to / with consultants to finalize automation project.	Automated insurance process and approval through LEAP.	SECP		30-Jun-26	
7	Resolution of issues relating to sales tax and income tax	1)Interaction with taxation authorities to highlight taxation issues	Necessary amendments in Federal / Provincial Sales	Federal Board of Revenue / Provincial	SECP/IAP	31-Dec-24	

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		2) Write letters / Have meetings to / with taxation authorities on the concerns of the industry and possible detailed alternate proposals.	Tax Laws and Income Tax Ordinance, 2001.	Revenue Boards/MoF			
		3) Policy advocacy with the Federal Government shall be done to devise a mechanism for transfer and utilization of FIF for sector development or elimination of FIF.					
8	Mandatory health insurance under provincial labour laws	Follow up with relevant ministries for proposed amendments in provincial labour laws regarding mandatory health insurance	Approval of proposed amendments in provincial laws by the provincial assemblies.	Provincial Ministries	SECP	31-Dec-26	
9	Enhancing the scope of mandatory group insurance under provincial labour laws	Follow up with relevant ministries for proposed amendments in provincial labour laws regarding mandatory group life insurance.	Approval of proposed amendments in provincial laws by the provincial assemblies.	Provincial Ministries	SECP	31-Dec-26	
10	Insurance Round Table	Arrange an industry round table with CEOs and BoD members of life and non-life companies to discuss strategic direction	Holding of Insurance Industry Roundtable	SECP	Insurance Companies	30-Sep-23	Roundtable held on August 30, 2023.
11	Insurance conference	1) Chalk out a plan for the insurance conference 2) Consultation with stakeholders 3) Administrative arrangements 4) Holding of Conference	Holding of Insurance Conference	SECP	IAP	31-Dec-23	International InsureImpact Conference held on 13-14 December, 2023.
12	Enabling the raising by	1) Review of international regimes	Notification for amendments in	SECP	IAP	30-Jun-24	Concept paper on <i>Issuance of</i>

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	insurance of subordinated debt for solvency purpose	for conceptual understanding 2) Review of existing regime to explore the possibilities of raising subordinated debts for necessary regulatory amendments 3) Proposing necessary amendments	Insurance Rules with the approval of policy board				<i>Subordinated Debt Securities by Insurance Companies and Treatment for Solvency Purpose</i> has been published on October 30, 2023.
13	Rationalization of regulatory returns and forms and regulatory approvals.	1) Discussion with industry at conceptual level regarding rationalization of regulatory returns, approvals, forms 2) Based on the feedback of the industry, amendments will be proposed in the rules/regulations	Sharing of the proposed amendments with industry Notification / Circular for amendments in the existing regulatory requirements	SECP	IAP	31-Dec-24	
14	Rationalization of product approvals requirements	Explore possibility for changing the approval of pure protection products / health products:1) Review of existing requirements for term assurance, accident & health insurance products for life insurance sector 2) Evaluate proposals of the industry in this regard 3) Rationalization of the existing requirements	Amendment in the existing notifications for product approval	SECP	IAP	30-Jun-24	Revised requirements for simplified submission for product approval have been published on February 15th, 2024.
15	Rationalization of solvency limits and alignment with	1) Discussion with industry at conceptual level regarding revision of solvency limits	Notification for amendments in the Insurance Rules, 2017.	SECP	IAP	30-Jun-24	Internal working has been shared with Pakistan Society

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	Unit Linked Products and Fund Rules, 2015.	2) Based on the feedback of the industry and thorough review of the rules, proposed amendments in the Insurance Rules, 2017.	Insurance Rules with the approval of policy board				of Actuaries to seek Proposal on alignment of investment limits as prescribed in Unit Linked Rules and Insurance rules.
16	Report on Micro and Inclusive Insurance.	1) Initiation of research work.	Publication of report on Micro Insurance.	SECP	IAP	31-Dec-23	Draft report was published on IIC 2023.
		2) Compilation of data for finalization.					
		3) Preparation of draft report and submission for approval.					
17	Report on Crop and Agriculture Insurance.	1) Initiation of research work.	Publication of report on Crop and Agriculture Insurance.	SECP	IAP	31-Dec-23	Draft report has been published at IIC 2023.
		2) Compilation of data for finalization.					
		3) Preparation of draft report and submission for approval.					
18	Motor Insurance Repository	1) Engage with CDC and industry players to develop consensus on modalities for launch of motor insurance repository.	Agreement of the participants on the modalities through an MOU.	CDC / General Insurance Companies	SECP	31-Dec-23	Formation of a committee with the representatives of Insurance companies, CDC and SECP.
		2) Pilot run of the repository with agreed participants.	Successful launch and completion of pilot run.			30-Jun-24	
		3) Final launch of the repository.	Fixing the improvements identified in pilot run and final launch of the repository.			30-Jun-25	
19	Implementation of Risk Based Capital / Solvency Regimes.	1) Development of data collection formats.	Circulation of format to the industry.	SECP	IAP	31-Dec-23	Data template has been finalized and data gathering has been initiated.
		2) Require data from companies for analysis.	Collection of data from all companies and completion of analysis.			30-Jun-24	

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		3) Valuation of technical liabilities.	Circulation of revised valuation requirements for consultation.			31-Dec-24	PSOA has been initiated to draft Valuation of Technical Liabilities requirements.
		4) Based on the analysis, finalize framework	Publication of document with amendments to the rules / regulations.			30-Jun-25	
		5) Parallel Run	Reporting from companies on the results of parallel run.			30-Jun-26	
		6) Final implementation	Implementation of the amendments.			31-Dec-27	
20	Implementation of IFRS 17.	1) Policy decision on takaful accounting.	Approval of commission in light of the recommendation of ICAP's Technical Working Group.	SECP	ICAP / IAP / PSoA	30-Sep-23	A policy decision has been taken on Takaful accounting treatment post implementation of IFRS 17.
		2) Finalization of guidance notes on following areas: a) Discounting b) Risk adjustment for non-financial risk c) Expense allocation d) Onerous contracts	Issuance of guidance notes by PSoA.			30-Sep-23	Guidance/ Education note has been issued by PSoA in consultation with ICAP working group and SECP.
		3) Initiation of System Design phase.	Circular letter on initiation and timing of system design phase.			30-Sep-23	A Circular has been issued on the initiation of Phase-III, along with guidelines.
		4) Completion of System Design phase.	Receipt of reports from all companies on system design.			30-Jun-24	
		5) Detailed treatment for takaful accounting under IFRS-17 and consequential changes in rules / regulations.	Finalization of the amendments in rules / regulations.			30-Jun-24	A committee has been formulated to draft detailed rules.

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		6) Dry Run.	Circular letter on initiation of dry run.			30-Sep-25	
		7) Final Implementation.	Final notification of implementation of IFRS-17.			01-Jan-26	Notification issued for implementation IFRS17 from 1st January 2026.
21	Risk Based Supervision.	Revision of off-site manual and on-site manual in light of IFRS 17 and RBC.	Revised on-site and off-site manual for insurance sector.	SECP		30-Jun-27	
22	Launch of insurance Policy Finder.	1) Engage with IAP to finalize modalities for launch of lost life insurance policy finder services and building of consensus.	Mutually agreed plan of action by the industry.	IAP	SECP	30-Jun-24	A committee has been formed at IAP level with representation of SECP, committee has held meetings and timelines have been defined towards finalization of vendor and development of policy finder.
		2) Creation of centralized platform integrated with industry players.	Confirmation by the industry for creation of integrated platform.				
		3) Finalization of launch of the policy finder.	Launch of Policy Finder.				
23	Introduction of Managing General Agent or Technical Service Provider Regime for retail products.	1) Review of international jurisdictions.	Comparative analysis of international review.	SECP	IAP	31-Dec-23	Review of the international jurisdiction in process and will be submitted along with concept paper.
		2) Need and regulatory analysis.	Regulatory analysis identifying the potential amendments in the rules / regulations on the introduction of the regime.			31-Dec-23	
		3) Preparation of Concept Paper.	Issuance of concept paper.			31-Mar-24	
		4) Necessary amendment in regulatory framework on the basis of feedback on concept paper.	Finalization of the amendments in rules / regulations or regulatory framework.			30-Jun-24	

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		5) Introduction of regulatory framework.	Approval of the amendments / regulatory framework.			30-Jun-24	
24	Conduct requirements of insurance brokers and surveyors.	1) Review of international regimes.	Comparative analysis of international regime's review.	SECP	IAP	31-Dec-23	Review of international jurisdictions is being completed.
		2) Review of gaps in local regulatory regime.	Regulatory analysis identifying the potential amendments in the rules / regulations on the introduction of the requirements			31-Jan-24	
		3) Finalizing necessary amendments in the regime.	Final notification for amendment in Rules / Regulations.			30-Jun-24	
25	Optimization study on reinsurance including PRCL's.	1) Finalization of template for data collection.	Issuance of data collection format to the companies.	SECP	IAP	31-Oct-23	The finalized template has been shared with insurance companies and their response is awaited.
		2) Study - Reinsurance optimisation approach.	Extraction of key findings from the data.			28-Feb-24	
		3) Finalization of the study through identification of key gaps.	Final report.			30-Jun-24	
26	Reinsurance capacity building.	1) Engagement with PRCL/MOC for strengthening PRCL financially and from service level stand point.	PRCL capitalization and improvement in service standards.	PRCL / MoC	SECP	31-Dec-24	
		2) Facilitate industry for reinsurance treaty and facultative arrangement.	Necessary amendment in relevant circulars where needed.	SECP	IAP	31-Dec-24	
		3) Engage with State Bank of Pakistan to	Necessary amendments in	SECP	IAP	31-Dec-24	

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		remove regulatory bottleneck for reinsurance arrangements and export of reinsurance arrangements.	regulatory framework and Foreign Exchange manual of SBP.				
		4) Facilitate setting up of new re-insurance company.	Interest for setting by new re-insurance company from private sector.	SECP	IAP	31-Dec-24	
		5)Facilitate participation of local insurers in public property re-insurance arrangement.	Engagement with stakeholders and issuance of necessary regulatory instructions.	NICL / PRCL / IAP	SECP	30-Jun-25	
		6) Facultative participation of NICL in private property facultative reinsurance.					
		7) Explore possibility of exporting insurance/reinsurance service to regional countries.	Engagement with industry and State Bank of Pakistan.	SECP	SBP	31-Dec-25	
27	Public sector insurers.	Engagement with relevant ministries and NICL and PLIC for resolution of outstanding compliance issues.	Engagement with relevant stakeholders.	SECP	MOC/Mis of Communication	31-Dec-24	
		Facilitate government in corporatization, listing and privatization of public sector insurers.		Privatization Commission/MoC	SECP		
28	Simplification of Illustration statement for saving products.	1) Industry be asked to share proposed Directive for consideration of SECP.	Email to industry for feedback and proposals for the revision in the existing illustrative directive.	SECP	IAP / PSoA	30-Sep-23	Draft directive has been finalized & shared with PSoA. After consultation with PSoA, the same shall be shared with industry for finalization.
		2) Directive be amended based on feedback and international research.	Finalize draft of the revised illustrative directive.			30-Nov-23	

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		3) Issuance of revised directive.	Final notification for amendment in the existing illustrative directive.			30-Jun-24	
29	Facilitate creation of Insurance pool.	1) Preparation of Concept paper on crop loan insurance pool.	Concept paper on Crop Loan Insurance Scheme.	SECP	IAP	30-Sep-23	Draft Concept paper published on IIC 2023.
		2) Facilitation and engagement with stakeholder for launch of crop insurance pool.	Agreement of the participants on the modalities through an MOU and formal launch.	MoF/ SBP	SECP / IAP	30-Jun-24	
		3) Preparation of concept paper on catastrophic / disaster pool.	Concept paper on catastrophic disaster pool.	SECP	IAP	31-Dec-24	SECP unveiled the insurance pool concept paper. Industry comments are sought to bring onboard recommendations.
		4) Creation of catastrophic risk pool through industry consultation.	Agreement of the participants on the modalities through an MOU and formal launch.	MoF	SECP / IAP	30-Jun-26	
30	Disaster risk and public property insurance programme.	Policy advocacy and support to relevant ministries for launch of national level disaster risk and public property insurance programme.	National level disaster risk/public property insurance programme.	MOF / MOC / NDRMF / NICL	SECP / IAP	31-Dec-26	
31	Reconciliation mechanism in the industry for reinsurance/ coinsurance and launch of centralized platform in this regard.	1) Engagement with the industry and PRCL to resolve reconciliation issues	Resolution of all the reconciliation issues between the insurance companies.	IAP	SECP / CDC	30-Jun-24	Co - insurance accounting / reconciliation mechanism has agreed upon by industry and significant progress has been made on the reconciliation on reinsurance.
		2) Engagement with CDC and industry players including PRCL for formation of centralized platform,	Consensus building among all stakeholders.			31-Oct-24	

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		after completion of reconciliation activity and finalize future course of action.					
		3) Launch of centralized platform for reconciliation and settlement of coinsurance/ reinsurance arrangement.	Formal launch of the centralized platform.			31-Dec-25	
32	Standardization of personal line policy document.	1) Review of existing policy document to identify conflicting areas	Identification of major conflicting clauses in policy documents of various insurance companies.	SECP	IAP	30-Sep-24	
		2) Share draft with industry for feedback for onward regulatory amendment.	Issuance of draft standard policy document for industry feedback.			31-Oct-24	
		3) Approval from Commission / Policy board for final notification.	Issuance of final notification.			31-Mar-25	
33	Facilitate takaful companies & window Takaful operator to get reinsurance for Takaful contracts / policies.	1) To be taken up with industry to identify the magnitude of the issue.	Holding meetings with affected entities.	SECP	IAP	31-Aug-23	SRO 1784(I) 2023-dated Dec 4th, 2023 notified by commission for eliciting public comments.
		2) Based on the feedback, the matter will then be taken up with Shariah board and the Commission.	Approval of the Commission after obtaining advise of Shariah Board.			31-Oct-23	
		3) Industry feedback on the draft amendments.	Circulation of the draft amendments and compilation of industry comments.			31-Dec-23	
		4) Obtaining approval of the policy board.	Final notification for amendment in Takaful Rules, 2012.			31-Mar-24	

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34	Amendments in GTR regulations - Presentation issue of General Window Takaful Operations.	1) Feedback from the industry.	Final notification for amendment in the General Takaful Accounting Regulations, 2019.	SECP	IAP	31-Jun-24	
		2) Based on the feedback, the matter will then be taken up with Shariah board and the Commission.					
		3) Industry feedback on the draft amendments.					
		4) Obtaining approval of the policy board.					
35	Development of the annuity market through collaboration with fund management industry for VPS and annuity market.	1) Development of concept paper on annuity market.	Issuance of concept paper.	SECP	IAP / SBP / AMCs	30-Jun-25	
		2) Engagement with Specialized Companies Division and relevant regulatees e.g. AMCs to understand the market and craft a product structure. Engagement with SBP for availability of relevant investment avenues.	Agreement of the industry on availability of annuity products in the market.				
36	Human resource capacity building.	1) Finalization of engagement plan.	Engagement plan.	SECP		31-Dec-23	Engagement Plan is being finalised.
		2) Facilitate capacity building and training of department regarding actuarial skills through coordination with PSOA, IFOA, SOA, international regulators and agencies.	Enhanced skill set of SECP insurance Division.	SECP		30-Dec-24	Insurance Advisor has set out training plan for SECP team on actuarial development. International bodies will be consulted with once approval process completed.
		3) Incentivizing officers to qualify professional insurance related certification.					

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37	Issuance of revised facultative approval circular.	1) Proposing amendments to the existing circular.	Circulation of the draft revised circular for public consultation.	SECP	IAP	31-Oct-23	Feedback has been sought/ from IAP for finalization of amendment in circular.
		2) Finalization of the circular for onward issuance	Circulation of the draft revised circular for public consultation.			30-Apr-24	
38	Amendments in Insurance Rules, 2017 and Accounting Regulations, 2017 in respect of treatment of advance withholding tax and holding of related Govt. Securities.	1) Conduct stakeholder consultation to develop industry wide consultation.	Meeting with stakeholders on the potential amendments.	SECP	IAP	31-Aug-23	S.R.O.1514(I)/2023 and S.R.O.1516(I)/2023 notified by commission for eliciting public comments.
		2) Proposing necessary amendments for public consultation.	Circulation of the draft amendments and compilation of the industry comments.			31-Oct-23	
		3) Approval of policy board for the proposed amendments.	Issuance of final notification for amendments in Insurance Rules, 2017 & Accounting Regulations, 2017.			31-Mar-24	
39	Engagement Plan with relevant stakeholders for achieving targets of five year plan.	Finalization of engagement plan for achieving the objective of journey to Insured Pakistan.	Engagement Plan.	SECP	IAP	31-Mar-24	
		Engagement session with different stakeholders.	Engagement Sessions.				
40	Publication of industry statistics report 2023.	1) Compilation of industry data.	Compiled industry data after coordinating with insurance players.	SECP	IAP	15-Aug-24	
		2) Approval of the Commission for publication of information.	Publication of the report.			30-Sep-24	

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41	Minimum service standards for retail products.	1) Preparation of the draft for industry consultation.	Circulation of the draft for industry comments and later compilation of the comments.	SECP	IAP	31-Dec-23	
		2) Finalization of the standards.	Issuance of the standards.			30-Jun-24	
42	Energize life insurance repository.	1) expansion of CISSII to other critical operational areas of life and non-life insurance after industry consultation and taking them onboard.	Agreement of the industry for timely update of data on insurance repository.	SECP	IAP / CDC	30-Jun-24	
	Enhance scope of life / non-life insurance repository.	2) In a 2nd phase, coordinate with CDC and industry to enhance the scope.	Agreement of the CDC and industry players.			30-Jun-24	
43	Availability of all consumer insurance products at EMLAAK portal.	Engage with industry to make insurance products available at EMLAAK.	Availability of products at EMLAAK portal.	SECP	IAP / CDC	31-Dec-24	
44	Onboarding of insurance on centralized KYC Gateway Portal.	1) Facilitate integration of insurance companies with CGP.	Onboarding of insurance companies on KYC Gateway.	CDC / IAP	SECP	31-Dec-23	13 insurance companies onboarded while 3 more are in process.
		2) Implementation of flow of information from insurance companies to CGP.				30-Jun-24	
		3) Sharing of physical and existing customer data on CGP.				30-Dec-24	
45	Facilitation to distribution saving polices via online channels.	1) Review of the existing regime to provide regulatory facilitation for such distribution via online modes.	Proposing amendments to the Unit Linked Products and Fund Rules, 2015.	SECP	IAP / CDC	31-Dec-23	Review of existing framework has been completed.
		2) Consultation with the industry for the proposed amendments & related official circulation in this regard.	Circulation of the draft for industry comments & later compilation of those comments.			30-Jun-24	

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		3) Approval of the policy board.	Notification of the final amendments.			30-Jun-24	
46	Engagement with Life industry to work on product value & sales conduct.	1) Conducting meetings with Life Insurance Industry for necessary regulatory facilitation.	Meeting with stakeholders on the potential amendments to the rules / regulations.	SECP	IAP	30-Sep-25	
		2) Proposing necessary amendments for public consultation.	Circulation of the draft amendments and compilation of the industry comments.			31-Oct-25	
		3) Approval of policy board for the proposed amendments.	Issuance of final notification for amendments in Insurance Rules, 2017.			30-Jun-26	
47	Capacity building of Public Sector insurers.	1) Engagement with NICL for finalization of financial statements and regulatory return for submission to SECP.	Finalization of financial statements and statutory returns for onward submission with SECP.	MoC	SECP	30-Jun-25	
		2) Facilitate the government in privatization of entities on privatization list.	Completion of privatization.			30-Jun-26	
		3) Extend necessary regulatory support to PLIC / Government for appointment of professional management.	Appointment of professional management at PLIC.			31-Dec-24	
		4) PLIC budget allocation as per the Promissory Note	Advocacy with concerned ministries.			30-Jun-24	
48	Launch of innovation fund and insurance awareness.	1) Drafting of concept note on launch of innovation fund.	Issuance of concept note.	SECP	IAP	31-Oct-24	Draft proposal has been shared with Ministry.
		2) Identifying & engaging with potential funding sources.	Meetings with relevant stakeholders.			31-Dec-24	
		3) Facilitate the stakeholdersto launch the fund.	Launch of innovation fund.			30-Jun-25	

Sr. No.	Action	Effort/Activity	Output	Primary Responsibility / Stakeholders	Secondary Responsibility / Stakeholders	Target Completion Date	Current Status
		4) Engagement with HEC and professional accounting bodies regarding insurance making insurance as part of curriculum.	Necessary correspondence with the concerned authorities.	SECP	HEC	31-Dec-24	
49	Takaful specific awareness.	1) Plan customer awareness campaign.	Detailed plan of awareness campaign with soft approval of potential donors and other stakeholders.	SECP / IAP		31-Oct-24	
		2) Engagement with stakeholders for funding and execution.	Consensus building between stakeholders on the awareness campaign.			31-Dec-24	
		3) Execution of awareness plan.	Holding of awareness activities.			30-Jun-25	
50	Implementation of uniform certification requirements for insurance agents.	1) Sample based review of the effectiveness of enforced certification requirements.	Identification of the shortcomings in the existing certification requirements.	SECP	IAP	31-Oct-24	
		2) Based on the review, propose necessary amendments to the rules / regulations.	Approval of the proposed amendments in the rules / regulations through policy board.			30-Jun-25	
51	Review of existing paid-up capital requirements.	1) Perform analysis to identify if there is requirement for amendment in capital requirements for insurers.	Review of various micro and macro economic factors, health of the industry and international best practices.	SECP	IAP	31-Dec-24	
		2) Based on the analysis, propose necessary amendments to the rules / regulations.	Approval of the proposed amendments in the rules / regulations through policy board.			30-Jun-25	

Sr. No.	Action	Effort/Activity	Output	Primary Responsibility / Stakeholders	Secondary Responsibility / Stakeholders	Target Completion Date	Current Status
52	Facilitate raising of alternative capital Insurance Linked Securities.	1) After introduction of the possibility to raise subordinated debt, review of existing regime and international jurisdictions to explore the possibilities of raising alternate capital for necessary regulatory amendments.	Issuance of concept paper.	SECP	IAP	31-Dec-24	
		2) Proposing necessary amendments.	Notification for amendments in Insurance Rules with the approval of policy board.			30-Jun-25	
53	Facilitate registration of new / Takaful Operators Digital/Micro Insurers.	1) Sample based review of the effectiveness of enforced certification requirements.	Necessary amendments in regulatory framework for facilitation of registration of Digital and Micro Insurers	SECP	IAP	31-Dec-24	
		2) On the basis of feedback and deliberation, process of regulatory amendment will be initiated.					
		3) Review of licensing policy to encourage registration of new / Takaful Operators digital/micro-insurers.					
54	Encouragement of listing.	1) Explore the possibility of mandatory listing and engagement with unlisted insurance companies to discuss potential benefits of listing	Amendments in regulatory framework, if needed Assignment of roles and responsibilities along with clear accountability measures to PSOA and PII	SECP	IAP	31-Dec-25	

Sr. No.	Action	Effort/Activity	Output	Primary Responsibility / Stakeholders	Secondary Responsibility / Stakeholders	Target Completion Date	Current Status
55	Energize PSOA and PII.	1) Active engagement with PII and PSOA to understand structure.	Assignment of roles and responsibilities along with clear accountability measures to PSOA and PII.	SECP	PSOA / PII	31-Dec-25	
		2) Identify areas for improvement and required assistance.					
		3) Finalize plan for execution.					
56	Energizing role of IAP	1) Work with IAP to have fair representation of all players.	Enhanced role of IAP for moving toward SRO.	SECP	IAP	30-Jun-24	
		2) Provide assistance wherever required for restructuring of the Association.					
		3) Ensure separate engagements with life and non-life members on specific issues.					
57	Review of Management Expense Limits.	Review of existing management expense limit and provide necessary relaxation to incentivize for long term development of the industry.	Amendment in management expense limit circular.	SECP	IAP	31-Dec-24	
58	Collaboration with Telcos to consider insurance more than a value added service.	1) Engagement with Telco's representatives to enhance visibility of insurance services.	Availability of full fledged insurance products through Telcos with more visibility as a main product.	SECP	Telcos / SBP	31-Dec-25	
		2) Engagement with SBP to facilitate distribution of small ticket & protection products through banks.					
59	Explore the possibility of embedded insurance.	Perform research on the possibility of implementation of embedded insurance	1) Necessary amendments in the regulatory framework for sell of embedded products.	SECP	IAP	31-Dec-25	
			2) Availability of embedded insurance products through different channels.				

Sr. No.	Action	Effort/Activity	Output	Primary Responsibility / Stakeholders	Secondary Responsibility / Stakeholders	Target Completion Date	Current Status
60	Parametric Insurance.	1) Conduct research on parametric insurance and feasibility of parametric insurance in Pakistan.	Promote parametric insurance for enhanced agriculture insurance and necessary amendments in regulatory framework.	SECP	IAP	30-Jun-26	
		2) Design a concept paper on Parametric Insurance.					
		3) Propose necessary changes in regulatory framework.					
61	Guidelines on cloud computing.	1) Conduct international research on cloud computing.	Issuance of draft guidelines.	SECP	IAP	30-Sep-24	
		2) Engagement with industry players.	Compilation of feedback of the industry.			30-Nov-24	
		3) Finalization of the guidelines.	Issuance of finalized guidelines in light of feedback of the industry.			31-Mar-25	
62	Facilitate automation of Marine Insurance business by PSW.	1) Engage with PSW and IAO to reach an agreement on the way forward.	Overall agreement between the parties to implement the process.	PSW/ IAP	SECP	30-Jun-23	A broader agreement has been reached between PSW and IAP for automation of marine insurance.
		2) Facilitation and Support PSW and IAP to formally agree the final design and implementation timelines.	Formal design of the process and implementation timelines.			30-Jun-24	
		3) Follow up on the implementation process and provide necessary facilitation /support to ensure the smooth implementation of the process.	Marine Insurance process automation/ go live.				