



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department- I

Adjudication Division

ORDER	
Name of Company:	M/s. Rural Community Development Programmes
Number and Date of Show Cause Notice (the SCN):	No. SECP/SCD/ADJ-I/RCDP/19/2020/149 dated November 05, 2024
Respondents:	M/s. Rural Community Development Programmes
Date(s) of Hearing(s):	April 24, 2025
Case represented by:	(i) Mr. Asif Hassan (Head of Compliance) (ii) Mr. Tahseen Shahzad (Head of IT) (As the Authourized Representatives)
Provisions of law involved:	Section 6A(2)(h) of the Anti-Money Laundering Act, 2010, read with Rule 4(1)(a) and Rule 6(1) of the AML/CFT Sanctions Rules, 2020, and Regulation 31(1) of the Securities and Exchange Commission of Pakistan (Anti Money Laundering, Combating the Financing of Terrorism and Countering Proliferation Financing) Regulations, 2020, for contravention of Regulation 25(1)(a), 9(b), and 16, read with Note (i)(f) and (ii) of Annexure I thereof.
Date of the Order:	June 05, 2025

This Order shall dispose of the proceedings initiated by the Securities and Exchange Commission of Pakistan (the "Commission") through the Show Cause Notice No. SECP/SCD/ADJ-I/RCDP/19/2020/149 dated November 05, 2024 ("SCN") against M/s. Rural Community Development Programmes (the "Company/Respondent") Regulation 31(1) of the Securities and Exchange Commission of Pakistan (Anti Money Laundering, Combating the Financing of Terrorism and Countering Proliferation Financing) Regulations, 2020 (the "AML Regulations"), read with Section 6A(2)(h) of the Anti-Money Laundering Act, 2010 (the "AML Act"), and Rule 4(1)(a) and 6(1) of the AML/CFT Sanction Rules, 2020 (the "AML Rules") for contravention of regulations 25(1)(a), 9(b) and 16 read with Notes (i)(f) and (ii) of Annexure 1 of the AML Regulations. of

2. The Company was incorporated on November 03, 2015 under Section 42 of the repealed Companies Ordinance, 1984. (the "Ordinance"), now the Companies Act, 2017 ("the Act"). The Company obtained license to carry out Investment Finance Services as a Non-Banking Finance Company (NBFC) under the Non-Banking Finance Companies (Establishment and Regulation) Rules, 2003 (the NBFC Rules) for a period of three years which was lastly renewed in October 2022. The principal activity of the Company is to provide cost effective micro finance services to needy persons in order to enhance their economic role.

3. Regulation 25(1)(a) of the AML Regulations provides that the regulated person shall undertake Targeted Financial Sanctions (TFS) obligations under the United Nations (Security Council) Act, 1948 and/or Anti-Terrorism Act, 1997 and any regulations made there under, including development of mechanisms, processes and procedures for screening and monitoring customers, potential customers and beneficial owners/associates of customers to detect any matches or potential matches with the stated designated/proscribed persons in the SROs and notifications issued by Ministry of Foreign Affairs (MoFA), National Counter Terrorism Authority (NACTA) and Ministry of Interior (MoI).

4. Regulation 9(b) of the AML Regulations provides that the regulated person shall verify the identity of that customer using reliable and independent documents, data and information as set out in Annex 1 of the AML Regulations and Note (i) (f) of the Annexure 1 provides the minimum information to be obtained and recorded on KYC (Know Your Customer)/ CDD form or account opening form; Contact number(s) and e-mail (as applicable) for due diligence purposes.

5. Regulation 16 of the AML Regulations provides that the regulated person should verify the identity of the customer and beneficial owner before establishing a business relationship or during the course of establishing a business relationship and note (ii) of Annexure 1 of AML/CFT Regulations provides that the copies of identity documents shall be validated through NADRA Verisys or Biometric Verification. The regulated person shall retain copy of NADRA Verisys or Biometric Verification (hard or digitally) as a proof of obtaining identity from customer.

6. Brief facts leading to the case are that the onsite inspection of the Company was initiated under powers conferred upon the Commission under Section 282I of the Ordinance and Section 6A(2)(f) of the AML Act, vide inspection Order bearing number SECP/OD/RCDP/2023-24/296 dated April 22, 2024 with a scope to assess compliance with the applicable AML/CFT regulatory framework. The Inspection team (the team) was mandated to examine the records of the Company for the period from January 01, 2023 till December 31, 2023 and was also authorized to examine records before and/ or after the said period, if required. The findings/ observations of the team were shared through Letter of Findings dated June 28, 2024 (LOF) with the Company and comments received from the Company on July 10, 2024 were incorporated at the relevant sections of the Inspection Report dated August 28, 2024.

7. The Inspection Report revealed the following deficiencies with the AML/CFT regulatory framework:

(i) Non-availability of designated and proscribed persons in the Blacklist /proscribed persons database maintained with the Company:

(a) Review of the proscribed persons database provided by the Company indicated that several individuals listed on the United Nations Security Council Consolidated List (UNSC List) as of June 3, 2024, were missing from their proscribed persons database. Moreover, details of designated persons available in the UNSC List, including aliases, father names, other spellings, etc. are not incorporated in the database of the Company which is considered important in enacting effective controls towards curtailing entry of designated persons as clientele of the company.

(b) Comparison of database maintained by the Company as of June 01, 2024 with the list of proscribed persons available on NACTA's website as of May 31, 2024 transpired that a significant number of persons (around 400) present in NACTA's proscribed persons list were not present in the Company's proscribed persons database

(ii) Discrepancies identified in Blacklist used for TFS screening:

(a) During review of the blacklist / proscribed persons database maintained by the Company, it has been noted that a significant number of CNICs in the blacklist were not adequately entered resultantlly the system of the Company was unable to search corresponding CNICs due to inaccurate and not in conformity to CNIC number format.

Further the CNICs of client/ spouse/ nominee/ guarantor/ consumer are entered with hyphen/ dash in the database of the Company at the time of account opening however while making entries in the blacklist maintained by the Respondent, some CNICs are entered without hyphen/ dash. Resultantly the entry of CNIC with hyphen/ dash at the time of account opening, will not be able to match with any CNIC present without hyphen/ dash in the Blacklist and will not generate an alert.

(b) It was noted during the inspection that a number of CNIC entries in the blacklist / proscribed persons database were not made in the column allocated for inserting CNIC numbers but were entered in the name or the address columns. Further such entries are also not in a format which is searchable, rather multiple details of a number of proscribed persons, merged together, were present in a single cell. Therefore, searching or screening through CNIC of persons whose CNICs are not mentioned in the correct column and available in the name or the address column could not be performed.

In view thereof, the weaknesses in the blacklist of the Company renders the screening process at the time of onboarding of clients and during periodic screening as ineffective,

- (iii) Anomaly in customers' database: Discrepancy in client, spouse and consumer CNIC numbers. During the review of customers details maintained by the Company, the Team identified various instances where CNIC numbers of clients, spouses, consumers etc. appeared to be inaccurate. It is believed that in the absence of accurate CNIC, the Company will not be able to carry out effective TFS screening.
- (iv) Anomaly in customers' database- Incorrect cell phone numbers detected in customers database, the team, during review of client database observed that the Company was not maintaining cell phone numbers accurately and noted following anomalies in this regard:
 - a No cell-phone number was mentioned against 29 clients;
 - b One cell phone number was mentioned for multiple clients;
 - c Significant quantum of cell-phone numbers was incorrect.
- (v) Verification of identification documents of client through Verisys system, review of the loan application forms, Risk Based Approach (RBA) forms, KYC/CDD documents etc. of borrowers, selected on sample basis, revealed that in most of the cases NADRA Verisys of customers, guarantors, beneficiaries, spouses were not available.

8. In view thereof, the weaknesses in the blacklist/proscribed persons database; and inaccurate CNIC entries of clients, spouse and consumers in client's database; renders the screening process at the time of onboarding of clients and during periodic screening as ineffective contrary to the requirement of regulation 25(1)(a) of the AML Regulations. Moreover, by recording cell phone numbers of clients inaccurately in the database and non-carrying out NADRA verisys of clients, the Company was also non-compliant with the requirements of regulations 9(b) and 16 read with note (i)(f) and (ii) of Annexure 1 of the AML Regulations. Therefore, the Company, is *prima-facie* in violation of regulation 25(1)(a), 9(b) and 16 read with note (i)(f) and (ii) of Annexure 1 of the AML/CFT Regulations, which attract the applicability of penal provisions of regulation 31(1) of thereof read with Section 6A(2)(h) of the AML Act and Rule 4(1)(a) and 6(1) of the AML Rules. The relevant provisions of law are as under:

Regulation 25(1)(a) of AML Regulations, 2020

"(1) The regulated person shall undertake TFS obligations under the United Nations (Security Council) Act 1948 and/or Anti-Terrorism Act 1997 and any regulations made there under, including:
(a) develop mechanisms, processes and procedures for screening and monitoring customers, potential customers and beneficial owners/associates of customers to detect any matches or potential matches with the stated designated/proscribed persons in the SROs and notifications issued by MoFA, NACTA and MoI."

Regulation 9(b) of AML Regulations:

"The regulated person shall:

....

- (b) verify the identity of that customer using reliable and independent documents, data and information as set out in Annex I."

Regulation 16 of AML Regulations:

"The regulated person should verify the identity the customer and beneficial owner before establishing a business relationship or during the course of establishing a business relationship."

Note (i)(f) of Annexure 1 of AML Regulations:

"(i) For due diligence purposes, at the minimum following information shall also be obtained and recorded on KYC (Know Your Customer)/CDD form or account opening form:

....

- (f) Contact telephone number(s) and e-mail (as applicable)"

Note (ii) of Annexure 1 of AML Regulations:

"The copies of identity documents shall be validated through NADRA verisys or Biometric Verification. The regulated person shall retain copy of NADRA verisys or Biometric Verification (hard or digitally) as a proof of obtaining identity from customer."

Regulation 31 of the AML Regulations:

"(1) Any contravention of these regulations shall be cognizable by the Commission in accordance with section 6A of the AML Act and liable to sanction provided in the AML/CFT Sanctions Rules, 2020 and imposed by the Commission according to Clause (h) of Sub-section (2) of Section 6A of AML Act."

Rules 4(1)(a) of the AML Rules:

"(1) On any contravention as set out in rule 3(2), any or all of the following sanctions may be imposed by the concerned AML/CFT Regulatory Authority, namely: -

(a) Impose a monetary penalty in accordance with these Rules;"

Rules 6(1) of the AML Rules:

"(1) The AML/CFT Regulatory Authority shall apply monetary penalties upto Rs. 100 Million per violation, in accordance with the risk-based penalty scale of the respective AML/CFT Regulatory Authority."

Section 6A(2)(h) of the AML Act, 2010:

"(2) AML/CFT regulatory authority shall exercise the following powers and functions with respect to its reporting entities, namely: -

.....
(h) impose sanctions, including monetary and administrative penalties to the extent and in the manners as may be prescribed, upon their respective reporting entity, including its directors and senior management and officers, who violates any requirement in section 7(1), 7(3) to 7(6) and 7A to 7H and any rules or regulations made thereunder or those who fail to comply with the TFS regulations. Any person aggrieved by the imposition of sanctions under this clause may prefer an appeal in such manner and within such period to such authority as may be prescribed."

9. While taking cognizance in the matter, the SCN was issued to the Company calling upon it to show cause in writing as to why penalty as provided under regulation 31 of the AML Regulations, read with Section 6A(2)(h) of the AML Act and rules 4(1)(a) and 6(1) of the AML Rules may not be imposed for contravening the above-mentioned provisions of the law. In response to which the Company vide its letter dated November 15, 2024, wherein the Company submitted on merits as under:

(i) Non-Availability of designated and Proscribed Persons in the Blacklist (the Company's Blacklist used for TF Screening) - Violation of Regulation 25(i)(a) of the AML Regulations

There were 2 findings in point no-(i), as under:

- a) UNSC List of Designated Persons*
- b) NACTA's list of Proscribed Persons*

The Company maintains an accurate and up-to-date blacklist database, regularly aligned with all received notifications and NACTA lists. The discrepancy noted by the inspection team was due to a human error in generating the reported file, resulting from an incorrect query by their system. However, they assure that all persons from the NACTA and UNSC lists are indeed present within their database.

To substantiate this, in past, on-site review in 2020, they submitted the Company's blacklist database to the Commission via email dated 27-01-21. In that submission, out of the 400-plus missing persons claimed, 28 persons from the NACTA and UNSC lists were already present in their database, confirming our data's completeness and accuracy.

Below are key points addressing this observation:

Proscribed Person Detection: During the on-site review, the inspection team tested the system by entering a proscribed individual into their database. The system immediately stopped the entry and generated an alert for the attempted transaction, demonstrating its effectiveness in identifying and restricting proscribed persons.

Randomized Screening Validation: The inspection team further tested their blacklist database by inputting random names, CNIC numbers, and IDs from the UNSC and NACTA lists. The system accurately generated and displayed all relevant names and details as requested, confirming the accuracy and completeness of their blacklist database.

Regular Screening Reports: they presented daily, monthly, and quarterly screening reports to the inspection team, demonstrating their commitment to thorough and ongoing monitoring. This included a live demonstration of their daily screening process, providing evidence of their consistent compliance with screening protocols.

IT Infrastructure and software Audit: the Company has signed MOU with Munslik to perform IT and Infrastructure Audit. This response highlights that their system effectively restricts proscribed persons, regularly updates based on UNSC and NACTA lists, and has robust monitoring processes in place.

(ii) Discrepancies Identified in Company's Blacklist used for TF Screening - Violation of regulation 25(1)(a) of the AML Regulations

a) CNIC Numbers not maintained completely/accurately & non-standardization of important details/CNIC Numbers

They add all the information as it is in the system which is provided by the regulators, MOFA, MoI, SECP. Sometimes NACTA, MoI, MOFA shared the incomplete information of proscribed persons and they make them part of their system. For Instance, incomplete CNIC numbers, numbers without hyphen/ dashes, CNIC numbers on non-standardized format/ pattern.

b) Non-Availability of Required Details/CNICs in the Correct Column of Blacklist

As mentioned in response of point (i) this is the same file and inspection team noted the discrepancies from this file which was generated by the system due to incorrect query. Their database fields, format and data are correct and accurate. Moreover, they recently transitioned their software to the Munslik platform. During this transition phase, some glitches were encountered in specific system controls, which they are actively addressed to ensure seamless functionality.

(iii) Anomaly in Customers' Database: Discrepancy in client, spouse and consumer CNIC numbers - Violation of regulation 25(1)(a) of the AML Regulation

Anomaly in Customers' Database

Due to database restructuring for its utility an effective use for the web application and mobile application to enhance customer services and improve the mandate of financial inclusion through digital technologies, this fundamental error surfaced during process of enhancement and due to running of update batch this happened.

Anomaly in customer database - Discrepancies in Client, Spouse and Consumer CNIC numbers

The algorithm for data arrangement relating to CNIC was built on total numbers instead of unique characters which led to such absence of data recognition being true or false. They have re-scripted and remodel it using as advance feature of specific format relevant layout, auto filling and non-recognized attributes which will automatically eliminate such discrepancies of pollution in the information addition to the system.

(iv) Anomaly in Customers' database, Incorrect Cell-Phone Numbers Detected in Customer's Database.

The Introduction of SMS based feature in the system is directed towards information and knowledge purposes for the client which is yet in the test and trial phase on their stage server.

In order to establish highest degree of confidentiality and Individuality, they provide COC based disbursement codes to the customers in physical manner on their passbooks to prevent any fraudulent incident and wrongful encashment.

Due to social taboo associated with female borrowers they are often refused and rejected by customers to furnish their phone numbers during the loan application stages and they fully respect and understand the privacy sentiment of their bonfires.

Also, this is an optional field in the system functions which has led to such mixture, duplications or inaccuracies highlighted accordingly. To curb this, they are reconsidering to designate this feature as a mandatory attribute to align disbursement and associated activities with the borrowers.

(v) Verification of Identification Documents of Client through Verisys system-violation of Note(ii) of Annex I of the AML Regulations

NADRA Verisys

The Company has adopted ADC/APS mechanism to facilitate customers relating to disbursement and collection provisions along with promoting convenience and accessibility to financial and digital platforms. They have outsourced the disbursement and collection with third parties i.e. banks and branchless banking.

The access rights to NADRA portal were suspended and subsequently barred for the whole industry by NADRA and a new alternative mechanism of BVPN connectivity has been introduced and they are relentlessly pursuing for this window to undertake verification of the applicants and borrowers once the restoration and re-connectivity is established between the Company and NADRA. This has generated the absence of the verification process and identification process for the selected dataset.

They are continuously following up with NADRA for the provision of the Verisys service, with no delays on their end. They have maintained a complete record of all follow-up communications, including emails and letters (All trail can be furnished on demand). Additionally, after several months of persistent efforts, they successfully entered into an agreement with NADRA this quarter. The installation and connectivity process are now pending initiation from NADRA.

10. In order to provide an opportunity for personal representation, a hearing in the matter was fixed for April 24, 2025. The hearing was attended by Mr. Asif Hassan (Head of Compliance) and Mr. Tahseen Shahzad (Head of IT) as the Authorized Representatives of the Company. The Authorized Representatives reiterated the written stance made vide letter dated November 15, 2024.

11. I have reviewed the facts of the case, written submission and response to LOF made by the Company and also considered the written and verbal submissions made by the Authorized Representatives. At this juncture, it is important to discuss the following legal and factual elements:

- i. With respect to the obligations under Regulation 25(1)(a) of the AML Regulations, it has been observed that regulated persons are required to develop mechanisms, processes, and procedures for screening and monitoring customers, potential customers, and beneficial owners or associates to detect any matches or potential matches with designated or proscribed persons as notified by relevant authorities. In relation to the observation regarding the absence of over 400 proscribed persons in the blacklist maintained by the Company for screening purposes, the Company initially contended that it maintains an accurate and up-to-date database, regularly aligned with all notifications received and the NACTA list. The Company attributed the discrepancy identified by the inspection team to a human error during the generation of the reported file, caused by an incorrect system query. However, no corroborating evidence was provided to the inspection team at that time. In response to the SCN, the Company has submitted list of blacklisted/proscribed persons dated January 27, 2021, previously

shared during an earlier inspection, which contains 28 of the approximately 400 proscribed persons noted as missing. This submission, however, is not cogent to establish ongoing compliance as the afore-said data base is unreliable. Given that sanction lists are dynamic and subject to periodic updates, reliance on data from 2020 does not satisfy the regulatory requirement for continuous and current screening and monitoring. The Company's inability to demonstrate the existence of an updated and effectively maintained screening mechanism during the review period constitutes a breach of the obligations set forth under the aforementioned regulation.

- ii. During the course of inspection, lapses were observed in the management and maintenance of the blacklist/proscribed persons database. It was noted that (a) CNIC entries were incomplete or inaccurately recorded, and not in conformity with the standard CNIC number format, thereby rendering the system ineffective in detecting potential matches; (b) CNICs were inconsistently recorded some with hyphens/dashes and others without—causing mismatches and system failures in triggering alerts. (c) several CNICs were incorrectly placed in non-designated fields such as name or address columns, with instances of merged multiple entries in a single cell, further impairing the searchability and integrity of the database. The Respondent, in their reply, stated that the inconsistencies in the data originated from the source files received from relevant authorities and cited a recent software migration to the Munslik platform as a contributing factor to temporary technical glitches. However, source data pertaining to only one individual mentioned in SCN was found to be inaccurate as per the source data provided in annexure to the Company's written reply. For all other individuals highlighted in SGN, the Company has not provided substantial evidence proving inaccuracy in source data.
- iii. The Respondent has failed to maintain accurate and reliable identification data in respect of clients, their spouses, and consumers, which constitutes a critical deficiency in compliance with Regulation 25(1)(a) of the AML Regulations. During the inspection, multiple instances were observed where CNIC numbers recorded in the customer database were inaccurate, incomplete, or improperly formatted. Such discrepancies undermine the integrity of the customer identification process and materially hinder the Company's ability to conduct effective TFS screening against designated/proscribed persons, as required under applicable legal and regulatory frameworks.

In its response the Respondent attributed the error to a recent database restructuring exercise aimed at enhancing digital utility and customer service delivery via web and mobile platforms. It has been stated that the anomaly surfaced during a system enhancement and the execution of an update batch. Furthermore, the Respondent acknowledged flaws in the original CNIC data handling algorithm, which relied on total numeric length rather than specific formatting logic. While subsequent remedial measures, such as re-scripting and implementing format-specific controls, were claimed to have been taken, the existence of such a fundamental lapse reflects weak data governance, inadequate validation controls, and ineffective oversight over core customer due diligence processes. These shortcomings adversely impact the effectiveness of the Company's TFS compliance framework and raise concerns regarding the robustness of its internal controls.

- iv. The Company has failed to comply with the requirements of Regulation 9(b) of the AML Regulations read with Note (i)(f) thereof, which mandates the verification of customer identity using reliable and independent documents, data, and information, including the collection of essential details as outlined in Annex I. Specifically, Note (i)(f) of the Annex requires regulated persons to obtain and record the contact number(s) and email (as applicable) for due diligence purposes.

During the course of inspection, deficiencies were noted in the customer database with respect to the accuracy and completeness of cell phone numbers. The inspection team observed that: (a) no cell phone number was recorded against 29 clients; (b) a single cell phone number was listed against multiple distinct client records; and (c) a substantial number of entries contained incorrect or invalid cell phone numbers. These anomalies constitute a material lapse in the customer due diligence process and hinder the effectiveness of identity verification, communication, and ongoing risk monitoring measures, including transaction alerts and TFS screening.

In response, the Respondent cited ongoing testing of an SMS-based system feature and referenced privacy concerns, particularly in the context of female borrowers, as contributing factors to incomplete

data collection. Furthermore, it was acknowledged that the system treated phone number fields as optional, resulting in inaccuracies, duplications, and gaps in customer contact information. While intentions to make the contact number field mandatory in future system enhancements were indicated, the current state of record-keeping reflects non-compliance with regulatory requirements and weak internal controls in customer data management. These deficiencies compromise the integrity of the AML/CFT framework and raise serious concerns regarding the adequacy of the Company's customer onboarding and due diligence mechanisms.

- v. The Company has failed to comply with regulation 16 of the AML Regulations, which requires verification of the identity of customers and beneficial owners prior to or during the establishment of a business relationship. Further, as per Note (ii) of Annexure I to the AML/CFT Regulations, copies of identity documents must be validated through NADRA Verisys or biometric verification, and the regulated person is required to retain a copy of such verification as proof.

During the inspection, a review of loan application forms, Risk-Based Approach (RBA) documents, and KYC/CDD records for borrowers revealed that, in most sampled cases, NADRA Verisys or biometric verification records were not available for customers, their guarantors, beneficiaries, or spouses. The absence of such verification represents a significant lapse in the customer due diligence process and undermines the reliability of identity authentication measures crucial for AML/CFT compliance.

In response, the Respondent explained that due to a sector-wide suspension of NADRA Verisys portal access and the ongoing transition to a new BVPN-based connectivity mechanism, they were unable to conduct the required identity verifications. It was further stated that they were actively pursuing restoration of access with NADRA and have signed a new agreement, with implementation pending on NADRA's end. Evidencing correspondence between the Company and NADRA provided in this regard indicates that the Company took up the matter with NADRA in a reactive manner, much after the inspection period, as the first email addressed to NADRA is dated October 10, 2024. In view of the fore-going it is crystal clear that the Company was non-compliant with the regulation 16 of the AML Regulations.

12. In view of the foregoing, the contraventions of regulations 25(1)(a), 9(b), and 16, read with Note (i)(f) and (ii) of Annex I of the AML Regulations have been established, which attract the applicability of Section 6A(2)(h) of the AML Act, 2010 and Rules 4(1)(a) and 6(1) of the AML Rules, 2020, read with Regulation 31 of the AML Regulations. I have given due consideration to the grounds presented by the Company and its authorized representative in response to the said non-compliances. Due regard has also been given to the fact that certain corrective actions were initiated by the Company subsequent to the conclusion of the inspection. I, therefore, in terms of the powers conferred under Section 6A(2)(h) of the AML Act read with Regulation 31 of the AML Regulations and S.R.O. 827(I)/2022 dated June 9, 2022, impose a penalty of **Rs. 200,000/- (Rupees; One Hundred Thousand Only)** on the Company on account of the established defaults.

13. The Company is hereby directed to deposit the aforesaid fine in the designated bank account maintained in the name of Securities and Exchange Commission of Pakistan with MCB Bank Limited or United Bank Limited within thirty (30) days from the date of this Order and furnish receipted voucher issued in the name of the Commission for information and record.



(Mahboob Ahmad)

Additional Director / Head of Wing
Adjudication Department-I

Announced:
June 05, 2025
Islamabad.