



783

SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department- I

Adjudication Division

ORDER	
Name of Company:	M/s. Garibsons Commodities (Private) Limited
Show Cause Notice No. & Date:	No.2(475)SMD/Adj-I/2025-695 dated July 10, 2025
Date of Hearing:	August 13, 2025
Case Represented by:	(i) Mr. M. Rashid Khan Mahar, Advocate; and (ii) Mr. Sarmad Aziz, Advocate <i>(As the Authorized Representatives of the Company)</i>
Provisions of Law Involved:	Section 6A(2)(h) of the Anti-Money Laundering Act, 2010 and Rule 4(1)(a) and 6(1) of the AML/CFT Sanction Rules, 2020 read with Regulation 31 of the Securities and Exchange Commission of Pakistan (Anti Money Laundering, Combating the Financing of Terrorism and Countering Proliferation Financing) Regulations, 2020
Order dated:	September 11, 2025

This Order shall dispose of the proceedings initiated by the Securities and Exchange Commission of Pakistan (the "Commission") through Show Cause Notice No. No.2(475)SMD/Adj-I/2025-695 dated July 10, 2025 ("SCN") in the matter of M/s. Garibsons Commodities (Private) Limited (the "Company") under 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") read with Regulation 31 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").

2. The provisions of Regulation 4 of the AML Regulations mandate the regulated persons to take appropriate steps to identify, assess and understand its money laundering, and terrorism financing risks for customers, countries or geographic areas and products, services, transactions or delivery channels. Furthermore, the aforesaid Regulation 4 of the AML Regulations *inter alia* requires the regulated persons to document their risk assessments and have appropriate mechanisms to provide risk assessment information to the Commission.

3. The provisions of Regulation 25 of the AML Regulations *inter alia* mandate the regulated persons to 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 Ministry of Foreign Affairs (MoFA), NACTA and Ministry of Interior (MoI).

4. In terms of Clause (r) of Regulation 3(1) of the AML Regulations, the futures brokers are included within the scope of regulated persons. Accordingly, the Commission issued S.R.O. 920(I)/2020 dated September 28, 2020 (the "SRO 920"), as amended vide S.R.O. 197(I)/2021 dated February 12, 2021 (the "SRO 197"), whereby all Regulated Entities (including futures brokers) were directed to comply with the following reporting requirements and submit information in the manner prescribed therein:

A. *Annual risk assessment and control/compliance assessment framework based on data and information as on March 31st, to be filed by April 30th of each financial year ("FY") ...*

D. *Compliance report on Statutory Regulatory Orders issued by the MoFA under United Nations (Security Council) Act, 1948 or intimation from National Counter Terrorism Authority/Law Enforcement Agencies/Home Departments of Provinces/Ministry of Interior regarding updates in the list of proscribed person(s)/entity(ies) under the Anti-Terrorism Act, 1997, shall be submitted to the Commission within forty eight (48) hours of receiving the same in the manner as may be instructed from time to time by the Commission.*

5. The relevant provisions of law are reproduced as under:

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

“(2) AML/CFT regulatory authority shall exercise and perform 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;”

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

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

Rule 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.”

Regulations 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.”

Regulation 4 of the AML Regulations:

“4. Risk Assessment - The regulated person shall take appropriate steps in accordance with section 7F of the AML Act to identify, assess and understand its money laundering, and terrorism financing risks for customers, countries or geographic areas and products, services, transactions or delivery channels. The regulated person shall:

- (a) document their risk assessments;*
- (b) consider all the relevant risk factors before determining what is the level of overall risk and the appropriate level and type of mitigation to be applied;*
- (c) keep their risk assessments up to date;*
- (d) categorize its own overall entity level risk as high, medium or low based on the result of risk assessment; and*
- (e) have appropriate mechanisms to provide risk assessment information to the Commission.”*

Regulation 25(1)(a) of the AML Regulations:

“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.”

SRO 920(I)/2020 dated September 28, 2020:

“A. Annual risk assessment and control/compliance assessment framework based on data and information as on 30 June, to be filed by 31st July of each financial year (“FY”), starting from the date of notification of this directive, and as instructed from time to time by the Commission.

- a) Risk Assessment Framework: Regulated Entities should undertake and submit their internal annual risk assessment which should be aligned with the risks identified in the latest National Risk Assessment of the country and cover the process adopted for risk identification. The risk*

assessment methodology should cover the risk emanating from customers, products, geography and delivery channels, elaborate risk tolerance level and assess residual risk after implementation of mitigation measures. Regulated Entities are encouraged to use the template given in Annex 1 to the Guidelines for reference, but may choose their own risk assessment methodology that best suits or represents their business covering the aforementioned risks, in light of the AML Act, 2010 and the Regulations. The risk assessment report should be reviewed and approved by the board of Page 2 of 4 directors of the Regulated Entities and shall be signed by the chief executive officer/ company secretary.

- b) *Compliance Assessment Checklist: Regulated Entities should submit their annual compliance assessment checklist to demonstrate adequacy and effectiveness of AML/CFT compliance framework in light of the Regulations, and are encouraged to use the checklist provided in Annex 2 to the Guidelines for this purpose.*

...

D. Compliance report on Statutory Regulatory Orders issued by the Ministry of Foreign Affairs under United Nations (Security Council) Act, 1948 or intimation from National Counter Terrorism Authority /Law Enforcement Agencies/Home Departments of Provinces/Ministry of Interior regarding updates in the list of proscribed person(s)/entity(ies) under the Anti-Terrorism Act, 1997, shall be submitted to the Commission within forty-eight (48) hours of receiving the same in the manner as may be instructed from time to time by the Commission.

Any person to whom this directive applies and who contravenes or fails to comply with the requirements of this directive or submits a return which is false in material respect or where under a misstatement is made shall be subject to sanction in accordance with AML Rules issued under the AML Act and imposed by the Commission according to section 6A of the AML Act."

SRO 197(I)/2021 dated February 12, 2021:

"In the aforesaid Notification, in section A, for their expression '30 June, to be filed by 31st July' the expression '31st March, to be filed by 30th April' shall be established."

6. The brief facts of the case are that the Company is licensed as a Futures Broker by the Commission and is thus a regulated person as per the definition provided under the AML Regulations as well as the within the scope defined under the SRO 920. During the compliance review of the Company with the requirements of the SRO 920 (as amended vide the SRO 197) for the period starting from **July 01, 2023 to June 30, 2024**, it was observed that:

- a) The Company failed to submit its Annual Risk Assessment report as required under Clause A of the SRO 920 in conformance with the SRO 197, detailed as under:

Requisite Submission under Clause A	Due Date	Submission Status
Annual Risk Assessment Report-2024	30-Apr-2024	Not Submitted

- b) The Company also failed to submit the Compliance Reports in respect of Statutory Regulatory Orders (SROs) in **148 instances (Annexure-A)** as required under Clause D of the SRO 920.

7. In order to ascertain the matter, the Commission vide an email dated June 05, 2025 sought explanation from the Company for the non-submissions of the aforesaid Annual Risk Assessment Report and Compliance Reports on SROs. Despite issuance of a reminder by the Commission on June 19, 2025, no response was received from the Company.

8. Taking cognizance of the matter, a SCN was served upon the Company to show the cause in writing as to why penal action may not be taken against it for alleged violation of the aforesaid requirements

prescribed under Section 6A(2)(h) of the AML Act and Rule 4(1)(a) and 6(1) of the AML Rules read with Regulation 31 of the AML Regulations. In response to the SCN, Mr. M. Rashid Mahar, Advocate of M/s. Rashid & Shaharyar, vide letter dated July 23, 2025 requested an extension for submitting the reply, which was duly granted by the Commission.

9. Subsequently, Mr. M. Rashid Mahar, Advocate of M/s. Rashid & Shaharyar vide letter dated August 13, 2025 *inter alia* submitted that:

The Company was incorporated on November 01, 2017 and holds the license of Futures Broker under the Futures Market Act, 2016 (the Futures Act) and is duly listed on the Pakistan Mercantile Exchange.

In light of the same, the AML Regulations specify a list of entities which will be considered as regulated entities, among which one is a commodities broker. There is no definition of the commodities broker in the AML Regulations, nor in the Futures Act, which causes difficulty for the Company to response to this SCN in a detailed and elaborate manner.

Considering the Company does fall under the term 'Commodities Broker' as per the AML Regulations, it is pertinent to mention that the required details in the compliance regime as established in the AML ecosystem are confusing, legally exhausting and require specific attention and literacy of the jargon. In such case, it is imperative that practice/training sessions be arranged for the Company and its representatives in order to make sure that compliances are in time. Nevertheless, no such training was given to the Company nor any reference to any training video given.

In the last five years, the Company in its entirety has not been an active; therefore, the spirit of the AML regime is not attracted. The Financial statements of the Company show that it does not have any revenue details as the Company has no transactions to record and is operating at a loss from 2018 to 2022. For 2023, the Company has a minimal amount of Rs. 277, 582/- as income from trading and in 2024 the amount is negative Rs.834,282/-. The profits being shown in these years come from consultancy fee categorized as other income.

The Company has ensured that all compliances are made, particularly with Clause D of the SRO 920 as mentioned in the SCN. To date, the entire record stands complete and updated.

It is requested to take a lenient view as this is the first instance of non-compliance. Since the Company is now well versed with the AML compliance regime, it has also engaged corporate lawyers and law firms to help it navigate the AML compliance in a better and more timely manner.

10. In order to provide an opportunity for personal representation and to meet the ends of justice, a hearing in the matter was fixed for August 13, 2025, which was attended by Mr. M. Rashid Khan Mahar, assisted by Mr. Sarmad Aziz (both Advocates of M/s. Rashid & Shaharyar), being the Authorized Representatives of the Company (**the "Authorized Representatives"**). During the course of the hearing, the Authorized Representatives reiterated the aforesaid written response and particularly admitted the non-compliance on part of the Company. Nevertheless, the Authorized Representatives informed about subsequent filing of requisite reports by the Company, assured full compliance with the requirements of law in the future, and requested for a lenient view in the matter.

11. Subsequent to the hearing, the Authorized Representatives vide letter dated August 18, 2025 *inter alia* submitted that the Company has now engaged a corporate consultant specialized in AML reporting requirements, and it will ensure future compliance with the law in a timely manner.

12. I have gone through the relevant provisions of Regulation 4 of the AML Regulations read with Clause A of the SRO 920 (as amended vide SRO 197) and Regulation 25 of the AML Regulations read with Clause D of the SRO 920 and considered the facts of the case, available record of the Company, as well as the written and the verbal submission made by the Authorized Representatives. I have also perused

Section 6A(2)(h) of the AML Act and Rule 4(1)(a) and 6(1) of the AML Rules read with Regulation 31 of the AML Regulations, which stipulate penal provisions for contravention of the afore-referred provisions of law. It is pertinent to highlight that the provisions of Regulation 4 of the AML Regulations read with Section A of SRO 920 (as amended vide SRO 197), impose a mandatory obligation on all regulated persons to timely file their Annual Risk Assessment Reports. These reports are central to the AML/CFT regulatory framework and are designed to ensure that the Regulated Persons adequately identify, assess and mitigate money laundering and terrorist financing risks. The Company was required to file its Annual Risk Assessment Report with the Commission by April 30, 2024 for FY2024; however, the Company submitted the said Risk Assessment Report on August 21, 2025 i.e. with a considerable delay of 478 days.

13. The provisions of Regulation 25 of the AML Regulations read with Clause D of the SRO 920 pronounce a mandatory obligation on all Regulated Persons to submit Compliance Reports within 48 hours of receipt of SROs of the MoFA and updates received from NACTA and MoI (competent authorities). This requirement is critical to ensure compliance with the statutory obligations prescribed under the AML regulatory framework and timely respond to & act upon the SROs issued by the competent authorities. However, the Company subsequent to SCN submitted 148 Compliance Reports on SROs with delay after the stipulated timelines in August, 2025.

14. The argument of the Authorized Representatives that the AML compliance regime is ambiguous is not tenable. The obligation to submit the Annual Risk Assessment Reports and Compliance Reports in respect of SROs is explicit, mandatory, and uniformly applicable to all Regulated Persons/Entities under the Law. As a licensed entity/person, the Company was under a clear and unequivocal legal obligation to ensure timely compliance with all applicable AML reporting requirements. Furthermore, the argument that the Company has been largely inactive and has generated minimal or no revenue is also untenable, as the AML Regulations and the SRO 920 are unequivocally applicable on all regulated persons/entities.

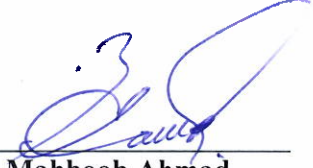
15. Another argument put forward by the Authorized Representatives is that the AML Regulations specify a list of entities that are considered as regulated entities, which includes a commodities broker; however, due to absence of definition of a commodities broker, the Company does not fall under its scope. This contention of the Company is largely misplaced and legally misconstrued, as the AML Regulations do not, in any way, define the Regulated Persons to include 'commodities brokers. The Regulation 3(1)(r) of the AML Regulations quite clearly and without any ambiguity defines Regulated Persons to include "futures brokers", instead of commodities brokers as incorrectly inferred by the Company. Thus, this argument stands redundant to the case at hand, and the AML Regulations are unequivocally applicable on the Company being a licensed futures broker. However, it is clearly evident that the Company failed to submit the aforesaid Annual Risk Assessment Report and Compliance Reports in respect of SROs within the stipulated timelines; thereby contravening the requirements of Regulation 4 and 25 of the AML Regulations read with Clause A and D of SRO 920 respectively.

16. In view of the foregoing, non-compliances/contraventions of the requirements of Regulation 4 and 25 of the AML Regulations read with Clause A and D of SRO 920 (as amended through SRO 197) respectively have been established, which attract the applicability of Section 6A(2)(h) of the AML Act and Rule 4(1)(a) and 6(1) of the AML Rules read with Regulation 31 of the AML Regulations. However, considering the fact that the Company in response to SCN has subsequently submitted its Annual Risk Assessment Report for the FY2024 and Compliance Reports on SROs in 148 instances and has also assured to timely comply with the requirements of law in future, I, therefore, in terms of 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 09, 2022, impose a penalty of **Rs.60,000/- (Rupees Sixty Thousand Only)** upon the Company on account of the established default. The Company is also advised to ensure meticulous compliance with all the requirements of the AML/CFT Regulatory framework in future.

17. The Company is hereby directed to deposit the aforesaid penalty 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.

18. In case the Company is aggrieved by this Order, it may, within thirty days of the date of this Order, prefer an appeal to the Appellate Bench of the Commission in terms of Section 33 of the Securities and Exchange Commission of Pakistan Act, 1997 in accordance with the procedure for filing an appeal as laid down under the Securities and Exchange Commission of Pakistan (Appellate Bench Procedure) Rules, 2003.



Mahboob Ahmad
Additional Director/Head of Wing
Adjudication Department – I
Licensed Entities Wing

Announced:
September 11, 2025
Islamabad.

Annexure - A

Garibsons Commodities (Pvt.) Limited

Instance of Non-Submission under Clause A

Name of Submission	Due Date	Submission Date	Submission Status
Annual Risk Assessment (Clause A) - 2024	30/04 2024	Non-Submission	Non-Submission

Instances of Non-Submission under Clause D

SRO Name	SRO Upload Date	SRO Due Date	Submission Status
HD KPK(Addition) 1 individual	04/07/2023	06/07/2023	Non-Submission
HD PUNJAB (Addition) 2 individuals	04/07/2023	06/07/2023	Non-Submission
HD KPK(addition)6 individuals	07/07/2023	09/07/2023	Non-Submission
HD KPK (Addition) 1 individual	10/07/2023	12/07/2023	Non-Submission
HD PUNJAB (Addition) 5 individuals	10/07/2023	12/07/2023	Non-Submission
HD PUNJAB (Addition) 7 individuals	10/07/2023	12/07/2023	Non-Submission
HD Punjab(ammendments) 4 individuals	10/07/2023	12/07/2023	Non-Submission
HD Punjab(ammendments) 5 individuals	10/07/2023	12/07/2023	Non-Submission
HD PUNJAB (Addition) 1 individual	13/07/2023	15/07/2023	Non-Submission
HD PUNJAB (Addition)5 individuals	13/07/2023	15/07/2023	Non-Submission
HD Punjab(ammendments) 1 individuals	20/07/2023	22/07/2023	Non-Submission
MOFA SRO NO 936	23/07/2023	25/07/2023	Non-Submission
HD PUNJAB (Addition) 1 individual	27/07/2023	29/07/2023	Non-Submission
HD Punjab Addition 1 Individual	01/08/2023	03/08/2023	Non-Submission
HD Punjab Addition 6 Individuals	02/08/2023	04/08/2023	Non-Submission
HD BALOCHISTAN(addition)5 individuals	03/08/2023	05/08/2023	Non-Submission
HD PUNJAB (Addition) 5 individuals	07/08/2023	09/08/2023	Non-Submission
HD PUNJAB (ammendments) 3 individuals	07/08/2023	09/08/2023	Non-Submission
HD PUNJAB (Addition) 5 individuals	08/08/2023	10/08/2023	Non-Submission
HD Punjab(ammendments) 1 individual	09/08/2023	11/08/2023	Non-Submission
HD PUNJAB (Addition) 1 individual	10/08/2023	12/08/2023	Non-Submission
HD PUNJAB (Addition)5 individuals	10/08/2023	12/08/2023	Non-Submission
HD Punjab (ammendments) 5 individuals	10/08/2023	12/08/2023	Non-Submission



HD PUNJAB (Addition) 15 individuals	15/08/2023	17/08/2023	Non-Submission
HD PUNJAB (Addition) 3 individuals	15/08/2023	17/08/2023	Non-Submission
HD Punjab (ammendments) 5 individuals	15/08/2023	17/08/2023	Non-Submission
SRO 831(i) 2023	15/08/2023	17/08/2023	Non-Submission
HD Punjab(ammendments) 3 individuals	16/08/2023	18/08/2023	Non-Submission
HD PUNJAB (ammendments) 2 individual	17/08/2023	19/08/2023	Non-Submission
KNIC(KPe.o48) in Pakistan	17/08/2023	19/08/2023	Non-Submission
HD KPK(ADDITION) 4 individuals	18/08/2023	20/08/2023	Non-Submission
HD KPK(addition)4 individuals	21/08/2023	23/08/2023	Non-Submission
HD BALOCHISTAN(addition)1 individual	22/08/2023	24/08/2023	Non-Submission
HD PUNJAB (ammendments) 1 individual	22/08/2023	24/08/2023	Non-Submission
SRO 1091 MOFA	22/08/2023	24/08/2023	Non-Submission
HD PUNJAB (Addition)3 individuals	23/08/2023	25/08/2023	Non-Submission
HD PUNJAB (Addition) 8 individuals	25/08/2023	27/08/2023	Non-Submission
HD PUNJAB (ammendment) 1 individual	25/08/2023	27/08/2023	Non-Submission
HD PUNJAB (ammendment) 1 individual	25/08/2023	27/08/2023	Non-Submission
HD PUNJAB (ammendment) 1 individual	14/09/2023	16/09/2023	Non-Submission
HD PUNJAB (Addition) 16 individuals	02/10/2023	04/10/2023	Non-Submission
HD Punjab(ammendments) 1 individual	02/10/2023	04/10/2023	Non-Submission
HD BALOCHISTAN(addition)1 individual	06/10/2023	08/10/2023	Non-Submission
HD PUNJAB (Addition) 1 individual	09/10/2023	11/10/2023	Non-Submission
MOFA SRO. 1415 (I) 2023	13/10/2023	15/10/2023	Non-Submission
MOFA SRO. 1416 (I) 2023	13/10/2023	15/10/2023	Non-Submission
HD Punjab(addition)1 individual	19/10/2023	21/10/2023	Non-Submission
MOFA SRO. 1522(I)/2023	08/11/2023	10/11/2023	Non-Submission
MOFA SRO. 1557(I) 2023	14/11/2023	16/11/2023	Non-Submission
MOFA SRO. 1563 (I)/2023	15/11/2023	17/11/2023	Non-Submission
SO(IS-I)10-53/2023	11/12/2023	13/12/2023	Non-Submission
HD Punjab - Additions dated 12.12.23 (19 Individuals)	12/12/2023	14/12/2023	Non-Submission
HD Punjab - Amendment dated 12.12.23 (1 Individual)	12/12/2023	14/12/2023	Non-Submission
HD Punjab - Additions dated 14.12.23 (7 Individuals)	14/12/2023	16/12/2023	Non-Submission

MOFA - S.R.O. 1792(I)_2023 Amendments 15.12.23	15/12/2023	17/12/2023	Non-Submission
HD Punjab - Additions dated 19.12.23 (12 Individuals)	19/12/2023	21/12/2023	Non-Submission
HD Punjab - Amendment dated 19.12.23 (1 Individual)	19/12/2023	21/12/2023	Non-Submission
MOFA - sro-S.R.O 1821 _2023 Amendments 19.12.23	19/12/2023	21/12/2023	Non-Submission
MOFA sro-S.R.O. 1841 _2023 - Amendments 20.12.23	20/12/2023	22/12/2023	Non-Submission
HD Punjab - Additions dated 21.12.23 (4 Individuals)	21/12/2023	23/12/2023	Non-Submission
HD Punjab Addition 13 Individuals	26/12/2023	28/12/2023	Non-Submission
HD Punjab Addition 1 individual	27/12/2023	29/12/2023	Non-Submission
HD PUNJAB ADDITION 8 INDIVIDUALS	28/12/2023	30/12/2023	Non-Submission
HD GB Addition 1 individual	05/01/2024	07/01/2024	Non-Submission
HD Punjab - Additions dated 08.01.24 (20 Individuals)	08/01/2024	10/01/2024	Non-Submission
S.R.O. No 13(I)/2024 - Amendments	08/01/2024	10/01/2024	Non-Submission
S.R.O. No. 12(I)/2024 - Amendments	08/01/2024	10/01/2024	Non-Submission
HD Punjab - Additions dated 09.01.24 (11 Individuals)	09/01/2024	11/01/2024	Non-Submission
HD Punjab - Additions dated 11.01.24 (5 Individuals)	11/01/2024	13/01/2024	Non-Submission
S.R.O. No. 29(I)/2024 dated January 11, 2024	12/01/2024	14/01/2024	Non-Submission
HD Punjab - Additions dated 16.01.24 (14 Individuals)	16/01/2024	18/01/2024	Non-Submission
HD Punjab - Amendments dated 16.01.24 (9 Individuals)	16/01/2024	18/01/2024	Non-Submission
HD Punjab Addition 2 Individuals	19/01/2024	21/01/2024	Non-Submission
HD Punjab Amendments dated 19.01.24 2 individuals	19/01/2024	21/01/2024	Non-Submission
HD PUNJAB ADDITION 3 INDIVIDUALS	23/01/2024	25/01/2024	Non-Submission
HD Punjab Addition 8 Individuals.	06/02/2024	08/02/2024	Non-Submission
MOFA - SRO No. 65(I)/2024 Amendments 09-02- 24	09/02/2024	11/02/2024	Non-Submission
HD KPK Addition dated 12-02-2024	16/02/2024	18/02/2024	Non-Submission

HD Punjab addition dated 14-02-24 (23) individuals	16/02/2024	18/02/2024	Non-Submission
HD Punjab Amendments dated 14-02-24 (16) Individuals	16/02/2024	18/02/2024	Non-Submission
MOFA - SRO No. 66 2024 dated 12th february 2024.	16/02/2024	18/02/2024	Non-Submission
HD Punjab Addition 5 Individuals dated 16-02-24	19/02/2024	21/02/2024	Non-Submission
HD Punjab Amendments 1 Individual 16-02-24	19/02/2024	21/02/2024	Non-Submission
HD Punjab - Additions dated 20.02.24 (12 Individuals)	20/02/2024	22/02/2024	Non-Submission
HD Punjab - Amendments dated 20.02.24 (1 Individual)	20/02/2024	22/02/2024	Non-Submission
HD Punjab - Additions dated 20.02.24 (4 Individuals)	21/02/2024	23/02/2024	Non-Submission
HD Punjab - Additions dated 21.02.24 (3 Individuals)	21/02/2024	23/02/2024	Non-Submission
HD Punjab - Addition dated 22.02.24 (1 Individual)	22/02/2024	24/02/2024	Non-Submission
MOFA-SRO 232(1) 2024 dated 21st February 2024	23/02/2024	25/02/2024	Non-Submission
HD Punjab - Additions dated 26.02.24 (3 Individuals)	26/02/2024	28/02/2024	Non-Submission
HD Punjab - Additions dated 26.02.24 (8 Individuals)	26/02/2024	28/02/2024	Non-Submission
HD Punjab - Amendments dated 26.02.24 (2 Individuals)	26/02/2024	28/02/2024	Non-Submission
HD Baluchistan Addition 2 Individuals	27/02/2024	29/02/2024	Non-Submission
HD Punjab - Additions dated 27.02.24 (4 Individuals)	27/02/2024	29/02/2024	Non-Submission
HD Punjab - Additions dated 28.02.24 (13 Individuals)	28/02/2024	01/03/2024	Non-Submission
HD Punjab - Amendment dated 28.02.24 (1 Individual)	28/02/2024	01/03/2024	Non-Submission
HD Punjab addition 1 individual	04/03/2024	06/03/2024	Non-Submission
S.R.O. No. 347 dated 06.03.24	06/03/2024	08/03/2024	Non-Submission
SRO 373	09/03/2024	11/03/2024	Non-Submission
HD Punjab - Additions dated 11.03.24 (37 Individuals)	11/03/2024	13/03/2024	Non-Submission
HD Punjab - Additions dated 11.03.24 (4 Individuals)	11/03/2024	13/03/2024	Non-Submission



HD Punjab - Additions dated 12.03.24 (7 Individuals)	12/03/2024	14/03/2024	Non-Submission
HD Punjab - Addition dated 14.03.24 (12 Individuals)	14/03/2024	16/03/2024	Non-Submission
HD Punjab - Amendments dated 14.03.24 (6 Individuals)	14/03/2024	16/03/2024	Non-Submission
hd punjab addition 1 individual dated 22-03-24	24/03/2024	26/03/2024	Non-Submission
HD PUNJAB AMMENDMENT DATED 22-03-24 1 INDIVIDUAL	24/03/2024	26/03/2024	Non-Submission
HD Punjab - Addition dated 25.03.24 (7 Individuals)	25/03/2024	27/03/2024	Non-Submission
HD Punjab - Additions dated 26.03.24 (43 Individuals)	26/03/2024	28/03/2024	Non-Submission
HD Punjab - Amendments dated 26.03.24 (28 Individuals)	26/03/2024	28/03/2024	Non-Submission
HD Balochistan - Additions 01.04.24 (3 individuals)	01/04/2024	03/04/2024	Non-Submission
HD Punjab - Additions dated 03.04.24 (18 Individuals)	03/04/2024	05/04/2024	Non-Submission
HD Punjab - Amendments dated 03.04.24 (5 Individuals)	03/04/2024	05/04/2024	Non-Submission
MOI - SRO No. 455(I)/2024	03/04/2024	05/04/2024	Non-Submission
HD Punjab - Addition dated 04.04.24 (1 Individual)	04/04/2024	06/04/2024	Non-Submission
HD Punjab - Additions dated 04.04.24 (7 Individuals)	04/04/2024	06/04/2024	Non-Submission
HD Punjab - Addition dated 05.04.24 (1 Individual)	05/04/2024	07/04/2024	Non-Submission
HD Punjab - Amendment dated 05.04.24 (1 Individual)	05/04/2024	07/04/2024	Non-Submission
HD BALOCHISTAN ADDITION 2 INDIVIDUALS	09/04/2024	11/04/2024	Non-Submission
S.R.O. No. 571(I)/2024 dated 16 April 2024	16/04/2024	18/04/2024	Non-Submission
HD Punjab - Additions dated 23.04.24 (3 Individuals)	23/04/2024	25/04/2024	Non-Submission
HD Punjab - Additions dated 23.04.24 (7 Individuals)	23/04/2024	25/04/2024	Non-Submission
MOFA- SRO- 625(I)/2024 Dated 28th April 2024	28/04/2024	30/04/2024	Non-Submission
HD Punjab - Addition dated 30.04.24 (1 Individual)	30/04/2024	02/05/2024	Non-Submission
HD Punjab - Addition dated 02.05.24 (1 Individual)	02/05/2024	04/05/2024	Non-Submission

HD Punjab - Additions dated 02.05.24 (7 Individuals)	02/05/2024	04/05/2024	Non-Submission
HD Punjab - Additions dated 03.05.24 (19 Individuals)	03/05/2024	05/05/2024	Non-Submission
HD Punjab - Addition dated 13.05.24 (1 Individual)	13/05/2024	15/05/2024	Non-Submission
HD Punjab - Additions dated 14.05.24 (9 Individuals)	14/05/2024	16/05/2024	Non-Submission
HD Punjab - Additions dated 15.05.24 (5 Individuals)	15/05/2024	17/05/2024	Non-Submission
HD Punjab - Additions dated 16.05.24 (8 Individuals)	16/05/2024	18/05/2024	Non-Submission
HD Punjab - Amendments dated 16.05.24 (2 Individuals)	16/05/2024	18/05/2024	Non-Submission
HD Punjab Addition 7 Individuals	21/05/2024	23/05/2024	Non-Submission
HD Punjab Ammendments 1 Individual	21/05/2024	23/05/2024	Non-Submission
HD Punjab - Additions dated 22.05.24 (30 Individuals)	22/05/2024	24/05/2024	Non-Submission
HD Punjab - Amendments dated 22.05.24 (18 Individual)	22/05/2024	24/05/2024	Non-Submission
HD Punjab - Amendment dated 23.05.24 (1 Individual)	23/05/2024	25/05/2024	Non-Submission
HD Punjab - Additions dated 24.05.24 (07 Individuals)	24/05/2024	26/05/2024	Non-Submission
S.R.O. No. 701(I)/2024 dated 23rd May 2024	24/05/2024	26/05/2024	Non-Submission
HD Punjab - Addition dated 27.05.24 (1 individual)	27/05/2024	29/05/2024	Non-Submission
HD Punjab Addition 5 individuals	28/05/2024	30/05/2024	Non-Submission
HD Punjab - Amendments dated 03.06.24 (8 Individuals)	03/06/2024	05/06/2024	Non-Submission
HD Punjab - Additions dated 04.06.24 (8 Individuals)	04/06/2024	06/06/2024	Non-Submission
HD Punjab - Addition dated 06.06.24 (1 individual)	06/06/2024	08/06/2024	Non-Submission
Amendment HD Punjab. 1 individual	07/06/2024	09/06/2024	Non-Submission
HD Punjab Ammendment 1 individual	13/06/2024	15/06/2024	Non-Submission
HD Punjab Addition 2 Individuals	24/06/2024	26/06/2024	Non-Submission
HD Punjab Addition 43 Individuals	24/06/2024	26/06/2024	Non-Submission
HD Punjab Ammendments 21 individuals	24/06/2024	26/06/2024	Non-Submission

