

Report On 7th Registrars' Conference, 2025



Transforming Registry Services for a Dynamic Corporate Sector

REGISTRARS CONFERENCE, 2025

*"From Paper to Platform:
a new chapter in Registry innovation - 100% online, No footfall"*



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Introduction

The 7th Registrars Conference 2025, was hosted by the Chairman and Commissioners of the Securities and Exchange Commission of Pakistan (SECP). The conference was held from 27th - 29th June 2025. The conference brought together Registrars from all over Pakistan and serve as a platform for sharing best practices, addressing operational challenges and enhancing the technical & regulatory capacity of registrars' to align with the Commission's digitalization vision.

The theme of the Conference was *"From Paper to Platform: a new chapter in Registry innovation - 100% online, No footfall"*. This theme reflects the department's strategic vision to fully digitalize company registration and post incorporation process, thereby eliminating the need of physical visits. These reforms underscores the transition towards a seamless and paperless environment where all corporate services are delivered electronically, ensuring greater efficiency, transparency & accessibility.

The objectives of the Registrars' Conference is to foster a collaborative environment for knowledge exchange on registry practices and emerging regulatory developments. The conference aims to embrace digitalization, fairness and accountability while enhancing operational capabilities to effectively address modern-day challenges. It further seeks to encourage the adoption of innovative technologies and forward-looking practices within the corporate registration framework.

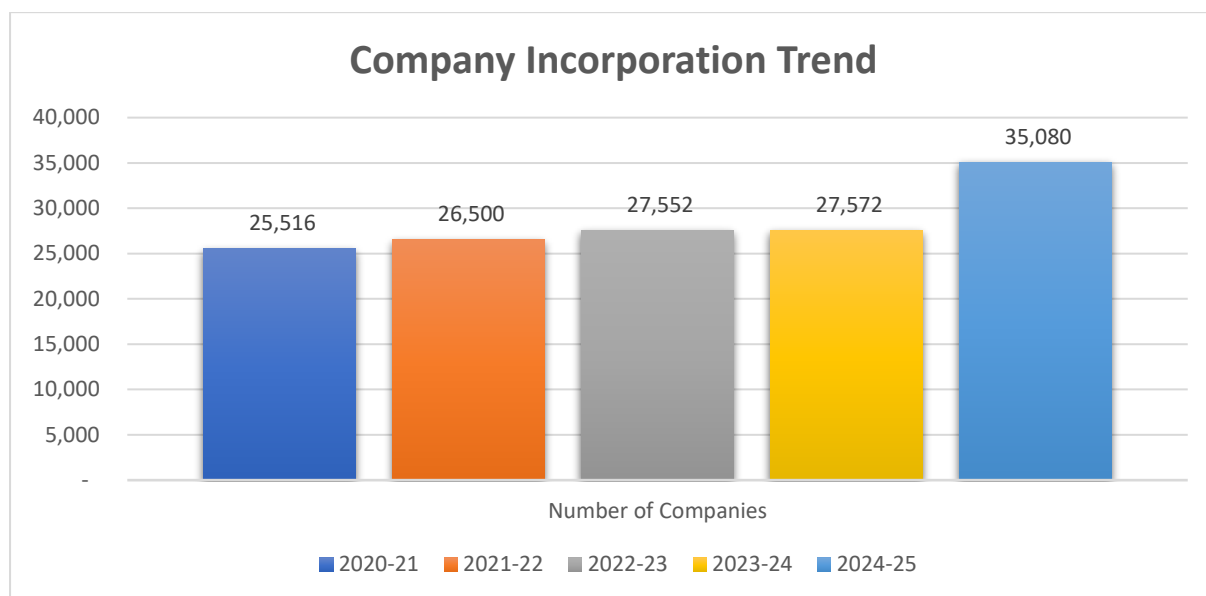
The conference was opened with a visionary keynote address by the Chairman SECP, marking a pivotal moment in the ongoing journey of institutional reform and digital transformation within Pakistan's corporate registry system. The Chairman emphasized SECP's transformation from a document-receiving registry into a fully digital registry, marked by the launch of the eZfile under the LEAP initiative. He outlined major reforms, including the One-Window Business Registration regime, end-to-end digital incorporation (with over 99% of registrations online), and the introduction of facilitation tools such as the FI Portal, digital certified copies, and the Secure Transaction Registry. He highlighted the Commission's significant progress in advancing corporatization and formalizing the economy—key pillars for sustainable growth and economic documentation. He proudly shared that Pakistan has surpassed the milestone of 250,000 registered companies, reflecting increased trust in formal business structures. He also emphasizes regulatory changes such as, the Companies Regulations 2024, has streamlined compliance and strengthened governance. He also underscored the SECP's collaboration with CDC to mandate book-entry shares for unlisted companies, aiming to protect investor rights and prevent fraud.

Participants of 7th Registrar Conference, 2025



Chapter 1: Company Incorporation & Name Reservation through AI

This chapter covers SECP's initiatives in streamlining the company incorporation process, i.e. policy and regulatory recommendations for enhancing corporate sector formalization and its efficiency, awareness and outreach initiatives for promoting Incorporation, and lastly AI based company name reservation process.

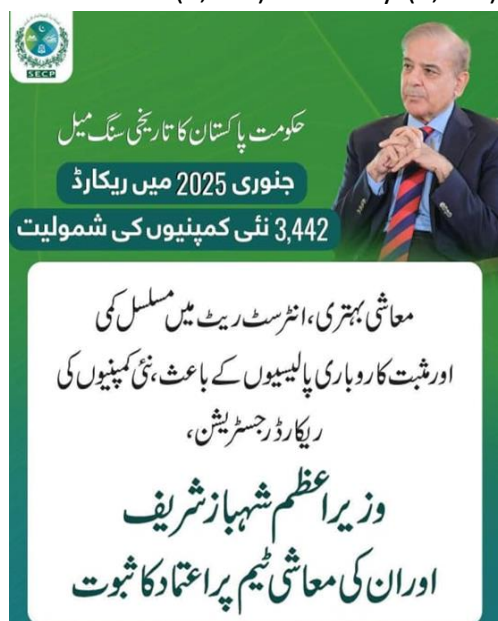


Upon completion of Financial Year 2024-2025, total number of incorporations exceeds 258,000 companies, (71% Private, 25% SMC, 1.5% Public, 0.4% Foreign, 0.8% Specialized) and yearly incorporations increased to over 35,000 companies.

Record incorporations have been witnessed for two months Jan (3,442) and May (3,605), recognized by Prime Minister of Pakistan. It was also appraised that name reservation processing time was reduced by 50% and 99.9% of companies are incorporated online reducing the time of incorporation by 40% resulting.

A. Policy and Regulatory Recommendations for Enhancing Corporate Sector Formalization

Tax Transition Provisions for Sole Proprietors and AOPs: Participants agreed that an in-depth study is needed to map how sole proprietorships and Associations of Persons (AOPs) move from an unincorporated regime to the corporate regime and into tax net. The review will consider allotment of different NTN by FBR upon conversion to sole proprietors and AOPs into corporate structure and streamline the process of conversion.



Digital On-boarding of Payment Merchants: Recognising the scale of informal e-commerce, penalists called for a targeted programme to bring payment-service providers such as JazzCash, Easypaisa and similar wallets to encourage their merchants / distributors / agents into the corporate fold. The initiative would bundle quick incorporation, and guidance on anti-money-laundering (AML) obligations so that digital merchants can transition smoothly to corporate status without disrupting their customer base.

Engagement with Government Bodies and Land Authorities: To widen the formal sector, SECP will open structured dialogues with federal and provincial ministries, the CDA, DHA, LDA, KDA and other land-development authorities. The goal is to embed a corporate-registration requirement into licensing and renewal process for housing schemes/societies, commercial plazas and industrial estates, ensuring that entities operating on public or regulated land have transparent corporate identities.

Analysis of Stand-alone versus Combined Incorporation Applications: Data scientists within the Registry should compare processing times, rejection rates and user satisfaction for stand-alone name reservations versus combined (name + incorporation) filings. If evidence shows that combined filings deliver faster turnaround with fewer errors, the Commission may phase out stand-alone applications and channel all users through a single streamlined pathway.

Integration of the Incorporation Portal with the Ministry of Interior: To speed up security vetting of foreign shareholders and directors, the conference endorsed technical integration of the incorporation portal with the Ministry of Interior's clearance system. A secure API will allow real-time transmission of required data including passport and supporting documents, replacing the current manual dispatch and shortening approval cycles.

Standard Operating Procedures for releasing Monthly Incorporation Data: It was agreed that a clear SOP may set the cut-off date, template and approval workflow for releasing monthly incorporation statistics. This will ensure consistent, timely press releases that enhance transparency and allow stakeholders to track business-formation trends.

Review of Name-Reservation Validity: Delegates proposed reducing the current 60-day name-reservation window, noting that long holds create artificial scarcity and hoarding. A shorter validity period—potentially 30 days—would encourage applicants to proceed swiftly to incorporation and free up desired names more quickly for other entrepreneurs.

Post-Incorporation Compliance Brochures: The Registry may provide a concise compliance brochure to every new incorporation certificate. The brochure will outline the first-year obligations—annual return filing, UBO declarations and maintenance of statutory registers—



so that new companies understand their duties from day one and avoid inadvertent non-compliance.

B. Awareness and Outreach Initiatives for Promoting Corporate Incorporation

Engagement with Commercial Attachés through the Ministry of Foreign Affairs (MoFA): The conference emphasized the importance of engaging Pakistani commercial attachés stationed in embassies and consulates worldwide as a strategic channel for promoting corporate formalization among overseas Pakistanis and foreign investors. It was proposed that structured awareness sessions be organized in collaboration with the Ministry of Foreign Affairs (MoFA) to equip commercial attachés with updated information on Pakistan's corporate registration process, recent digital reforms, and the benefits of incorporating a company under Pakistani law. This initiative aims to create an informed network of facilitators who can guide potential investors and diaspora entrepreneurs in initiating business ventures within Pakistan.

Webinars on Company Incorporation: The use of digital learning tools was strongly encouraged, with a specific recommendation to develop a series of webinars covering various aspects of company incorporation. These webinars should be hosted on SECP's official YouTube channel and other digital platforms, allowing both local and international audiences to access free, reliable information.

Podcast Series on Incorporation Processes: To complement traditional outreach efforts, the conference also proposed the launch of a podcast series focused on the company incorporation journey in Pakistan. The podcast would feature interviews with SECP experts, success stories from entrepreneurs who have benefited from formalization, and explainers on regulatory procedures.

Analysis of Low Incorporation Trends in Karachi: A key point of discussion was the relatively low incorporation rate in the Karachi compared to other big cities. It was agreed that a detailed analysis be conducted to examine the underlying causes—such as lack of awareness, limited digital adoption, or comparison of facilities available in other provinces for start-ups. The findings would inform the design of region-specific interventions, including localized awareness campaigns, capacity-building of facilitation officers in CRO Karachi, and possible collaboration with government to remove any unintended barriers to entry.

C. Power Based AI based company name reservation

Timeline for AI-Driven Company Name Reservation: The conference highlighted the need to formalize a clear implementation timeline for the launch of an AI-based company name reservation system. Participants emphasized that this technological advancement should be rolled out in well-defined phases—beginning with controlled pilot testing, followed by stakeholder feedback, training of Business Centre officers, and eventual full-scale deployment.

Analysis of Name Rejection Trends for AI Model Development: To train the AI system for name reservation effectively, it was recommended that the team first conduct a comprehensive analysis of historical name rejection data. This would involve identifying the most common grounds for rejection—such as duplication, use of prohibited words, trademark conflict, or regulatory non-compliance. Incorporating these insights into the AI's algorithmic logic will help ensure that the system mimics the reasoning of experienced Registrars, maintains consistency with existing rules, and reduces back-and-forth with applicants.

Regulatory Alignment of AI Name Reservation: Another critical area of discussion was the regulatory alignment of the AI-based name reservation system. The conference stressed that the system's decision-making capabilities must comply with relevant provisions of the Companies Act, 2017, and IPO regulations. Special attention must be paid to ensure that AI-generated approvals do not inadvertently allow names that infringe on existing trademarks, violate sector-specific rules, or include terms restricted under statutory frameworks.

Assessment of AI Application in Post-Incorporation Processes: In addition to pre-incorporation functions, the potential use of AI in post-incorporation processes was explored. Areas identified for possible automation include the review of compliance filings, pattern recognition in annual returns, and identification of anomalies in shareholder or director changes. Participants noted that such applications could significantly reduce turnaround times, improve data accuracy, and ease the burden or work on existing resources.





Based on the deliberations in the Registrars' Conference, the following expanded action plan is recommended:

Recommendation	Action Items	Deadline
1. AI based company name reservation	<p>Deployment of AI-Driven Company Name Reservation AI-based system for company name reservation for internal usage.</p> <ul style="list-style-type: none"> a. Analysis of Name Rejection Trends for AI Model Development. b. Evaluate whether the proposed AI-based name reservation system is fully compliant with applicable IPO regulations and naming conventions under the Companies Act, 2017. c. Deployment of AI based name reservation process for external users 	30 th Sep 2025
2. AI based Post Incorporation process	<ul style="list-style-type: none"> • Assessment of AI application in Post-Incorporation Processes 	31 st Dec 2025
Policy and Regulatory Recommendations for Enhancing Corporate Sector Formalization and Efficiency	<ul style="list-style-type: none"> • Engagement with Telecom operators for onboarding of Payment Merchants as companies Persuasion letters be issued to telecom operators and PTA to engage merchants, agents and distributors which are conducting business, however, not in the form of company registered under Companies Act, 2017. 	15 th Aug 2025
	<ul style="list-style-type: none"> • Engagement with Government Bodies and Land Authorities Proactive engagement with relevant Ministries, Departments and land development authorities (e.g., PPRA, CDA, DHA, LDA, KDA) to be undertaken to mandate corporate registration for their regulated entities. (letters to be issued by Aug 15, 2025). 	30 th Nov 2025

	<ul style="list-style-type: none"> • Analysis of Standalone vs. Combined Incorporation Applications Data-driven evaluation of standalone and combined incorporation applications is essential to determine the feasibility of <u>permitting combined applications only</u>. • Security of Foreign Directors / shareholders and integration of electronic portal with Ministry of Interior (MOI) It will be expedited at top level, in this regard, ROC to coordinate with Chairman Office • Circulation of Post-Incorporation Compliance Brochures with Certificate of Incorporation Dispatch of a comprehensive brochure outlining key post-incorporation compliance & reporting requirements alongside the issuance of incorporation certificates. • Tax Transition Provisions for Sole Proprietors and AOPs Matter of allotment of different NTN upon conversion of sole proprietors and Association of Persons in to companies, be taken up with FBR. 	<p>31st Aug 2025</p> <p>-DO-</p> <p>31st Aug 2025</p> <p>31st Aug 2025</p>
<p>Awareness Outreach Initiatives Promoting Corporate Incorporation</p> <p>and for</p>	<ul style="list-style-type: none"> • Engagement with Commercial Attachés through MoFA Conduct structured awareness sessions in collaboration with the Ministry of Foreign Affairs, targeting commercial attachés stationed abroad to facilitate foreign investors including overseas Pakistani Businessmen. • Webinars / Seminars on Company Incorporation Develop and upload a series of informative webinars on company incorporation to official social media platforms like facebook, LinkedIn etc. 	<p>31st Oct 2025 for making collaboration with MOFA</p> <p>Initiated</p>

	<ul style="list-style-type: none"> • Podcast Series on Incorporation Processes Launch a podcast series focusing on various aspects of the incorporation journey, featuring expert interviews, success stories and insights into regulatory facilitation. • Reason for low incorporation in Karachi CRO and remedial measures thereon Analyze the reasons for low incorporation and growth rate in the Karachi. 	<p>Ongoing</p> <p>30th Sep 2025</p>
Expansion of Corporate Base	<ul style="list-style-type: none"> • Set a strategic goal to increase the number of incorporated companies from 250,000 to 1 million, promoting formalization and economic growth. 	On-going

Chapter 2: Challenges and Way Forward

This chapter highlights the practical and operational issues faced by nine (9) Company Registration Offices (CROs) across the country and presents a forward-looking agenda to address their structural inefficiencies. Drawing from feedback provided by regional CRO in-charges, it offers a comprehensive view of the administrative constraints, resource gaps and operational hurdles affecting daily functions.



A. Technology-Driven Compliance and Process Automation

AI-Based Compliance Monitoring: The conference highlighted the potential of AI tools in strengthening regulatory compliance. A key proposal was to deploy AI to monitor annual return filings and implement checks that prevent submission of new processes if previous statutory filings are pending. This would promote chronological filing discipline and reduce instances of skipped or backdated compliance.

Digital Issuance of Certified Copies: Participants endorsed a transition toward digitally issued certified documents, equipped with QR codes for instant verification. This move will enhance document security, authenticity, and ease of validation for both regulators and third parties such as banks, courts, and government departments. The initiative aligns with SECP's broader digitization goals and will eliminate the need for physical document authentication in most routine scenarios.

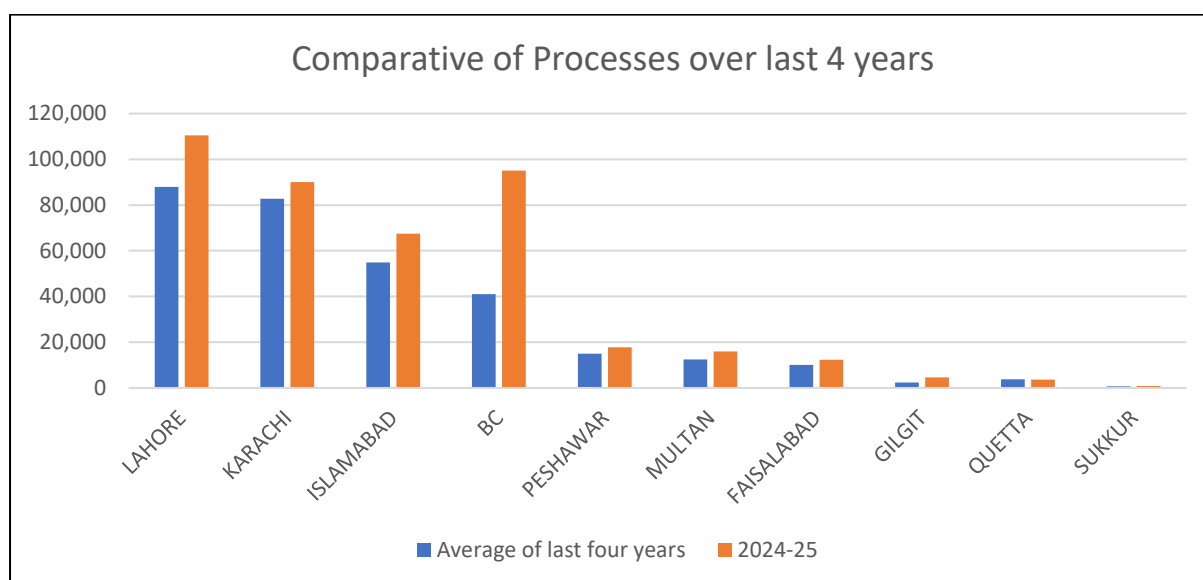
Work Allocation System: The conference recommended the introduction of a system for task allocation within CROs and Registry operations. This would allow for systematic task distribution, improve transparency, and help monitor individual performance and workload.

Operationalization of Online Inspection Module: A dedicated discussion was held on the progress and future timeline for launching a fully operational online inspection module. It was agreed that this feature is critical to reducing physical visits and enabling remote document reviews by stakeholders.

Root Cause Analysis of LEAP System Issues: In response to ongoing user concerns, the need for a comprehensive root cause analysis (RCA) of the LEAP system issues was emphasized. For this purpose a user survey has also been launched where external users will provide feedback on short-comings in eZfile. The findings will inform targeted system improvements and support efforts to make LEAP more user-friendly and resilient.

Record Volume of Processes Handled by CROs / BC in FY 2025: During FY 2025, the Company Registration Offices (CROs) & BC achieved historic milestone by processing, 418,347 filings, the highest-ever number of applications and filings in a single fiscal year. This surge reflects the growing confidence of businesses in SECP's digital platforms and the increased pace of formalization across the corporate sector. The unprecedented volume of work included incorporations, statutory returns, changes in company particulars, and post-incorporation filings—handled efficiently despite limited resources. This achievement underscores the dedication and resilience of CRO & BC teams, as well as the positive impact of recent reforms, including automation, eZile enhancements, and improved internal coordination.

CROs	Average of last four years	2024-25	Grand Total
LAHORE	87,978	110,469	26%
KARACHI	82,737	90,080	9%
ISLAMABAD	54,841	67,525	23%
BC	41,045	95,073	132%
PESHAWAR	14,947	17,782	19%
MULTAN	12,487	15,962	28%
FAISALABAD	10,063	12,303	22%
GILGIT	2,316	4,651	101%
QUETTA	3,769	3,653	-3%
SUKKUR	722	850	18%
Grand Total	310,905	418,347	35%



B. Regulatory Jurisdiction

Continuous Updating of CRD Manual and Officer Training: The conference underscored the importance of maintaining consistency and legal accuracy across Company Registration Offices (CROs). It was agreed that the Corporate Registration (CRD) Manual must be regularly updated to reflect changes in laws, procedures, and digital workflows. Additionally, periodic training sessions should be conducted for CRO officers to ensure a uniform interpretation and application of regulatory provisions.

Accreditation of Intermediaries: To enhance professional accountability, it was proposed that SECP introduce a formal accreditation mechanism for registered intermediaries (e.g., consultants, legal advisors). This framework aims to safeguard corporate filings from inaccurate or misleading submissions and build trust in the intermediary ecosystem.

Regulatory Compliance at the Time of Mortgage Registration: The conference emphasized the need to enforce regulatory compliance at the stage of mortgage registration, rather than treating it as a standalone or post-incorporation event. Companies will be required to meet all relevant regulatory obligations before registering charges or mortgages, thereby reducing the risk of non-compliant or shell entities securing financial credit. It was recommended that relevant regulations be amended to integrate compliance checks into the mortgage registration workflow.

Standardization of Official Communication in Examination Process: To streamline communication and reduce ambiguity during the document examination stage in eZfile, participants proposed the introduction of standard templates and observation formats for each process. This would promote clarity, consistency, and efficiency in Registrar observations, and improve the quality of responses submitted by applicants.

Market-Led Compliance Culture: Beyond enforcement and penalties, the conference encouraged fostering a market-led compliance culture where companies are motivated to comply with regulations due to peer expectations, reputational value, and investor confidence. Such a culture can be promoted by making compliance histories more visible, encouraging public disclosures, and rewarding good governance through recognitions or certifications. This approach would complement formal enforcement tools and create a more self-sustaining compliance environment.

C. Awareness & Outreach

Standardized Awareness Materials: The conference emphasized the importance of maintaining standardized pamphlets, brochures, and awareness materials to be used uniformly across all Company Registration Offices (CROs) and outreach events. These materials would cover key topics such as the incorporation process, post-incorporation compliances, digital filing procedures, and stakeholders' legal responsibilities. A uniform set of resources will help ensure that all stakeholders—whether in urban centers or remote areas—receive the same clear, accurate, and up-to-date information.

Utilization of Digital Awareness Platforms: Recognizing the shift towards digital engagement, participants proposed a structured plan to leverage modern digital platforms for awareness and education. This includes launching webinars, podcasts, animated explainer videos, and targeted social media campaigns to communicate regulatory updates, compliance deadlines, and user guidance on using SECP systems like eZfile.

Measuring Awareness Impact: To ensure that awareness campaigns are effective and impactful, the need for a formal monitoring and evaluation mechanism was discussed. SECP will work toward establishing quantifiable metrics—such as user engagement rates, webinar attendance, feedback scores, and follow-up actions—to evaluate the success of each outreach initiative. This data-driven approach will allow for continuous improvement, helping the Commission refine content, select the most effective channels, and allocate resources to campaigns with the highest return on engagement.

D. Capacity Building & Inter-departmental Coordination

Capacity Building and Coordination among CROs: To enhance institutional efficiency and regulatory consistency across Company Registration Offices (CROs), the conference underscored the importance of continuous training, professional exposure, and structured coordination. It was proposed that CRO officers be regularly nominated for inter-departmental events, workshops, and professional development programs to broaden their understanding of cross-functional regulatory matters. In parallel, the conference recommended the institutionalization of fortnightly coordination meetings among CRO Incharges, to be led by the Commissioner, Executive Director (ED) and the Registrar of Companies (RoC). These structured sessions would serve as a platform to review operational challenges, share best practices, and ensure uniform implementation of policies across all CROs.

Dedicated Legal Resource at CROs: Recognizing the growing volume and complexity of legal matters handled at the CRO level, participants recommended the deployment of dedicated legal personnel in each CRO to manage litigation and respond to court matters. This structured approach would ensure timely, accurate, and legally sound responses while reducing dependence on ad hoc arrangements.

Engagement with Banking Sector through PBA: To improve alignment between SECP and financial institutions, it was recommended that awareness sessions and seminars be conducted for banking professionals in collaboration with the Pakistan Banks' Association (PBA). These sessions would update bankers on regulatory developments, the legal validity of digital certified documents, and the use of SECP's digital platforms such as the Financial Institution Portal and Electronic Mortgage Register. This initiative aims to enhance mutual understanding, reduce procedural bottlenecks, and promote seamless service delivery between regulators and banks.

Future outlook of CROs: To improve the overall service delivery and public interface of Company Registration Offices (CROs), it is recommended that CROs be restructured and upgraded in line with the successful Business Centre (BC) model. By replicating the high-performing and digitally enabled environment of the Business Centre, CROs can transform into fully service-oriented hubs, significantly enhancing user experience, operational efficiency, and stakeholder confidence in SECP's regional offices.

Suggestions for Improvement & Way Forward

Based on the discussion, the following expanded action plan is recommended:

Recommendation	Concrete Steps	Deadline
Technology-Driven Compliance and Process Automation	<ul style="list-style-type: none"> Digital Certified Copies Transition to issuing certified documents digitally with QR codes to enhance security, authenticity, and ease of verification. 	31 st Aug 2025

	<ul style="list-style-type: none"> • Work Allocation and changes in Companies Regulations, 2024 Introduce a ticketing system to assign tasks systematically, improving transparency, tracking, and workload distribution. • Operational Online inspection Module Time frame to be provided for fully operational online inspection module • Access of registered intermediaries to FI portal All registered intermediaries will have access to information available on FI portal 	<p>Pilot Project till 30th Oct, 2025</p> <p>30th Sep 2025</p> <p>31st Aug 2025</p>
Regulatory Jurisdiction	<ul style="list-style-type: none"> • Accreditation of intermediaries Formal accreditation mechanism for registered intermediaries to be introduced. • Up-to-date statutory compliance at the time of mortgage registration Companies to make fully compliant at the stage of mortgage registration including recovery of penalty. Regulations to be amended accordingly. • Standardization of observations at desk-based review stage through SOPs in CRD Manual Standard template/observation to be introduced for each process in eZfile. 	<p>30th Sep 2025</p> <p>-Do-</p> <p>31st Oct 2025</p>
Awareness & Outreach	<ul style="list-style-type: none"> • Utilization of Digital Awareness Platforms: Schedule a planned outreach initiative using modern digital engagement tools such as podcasts, webinars, and social media campaigns to enhance visibility, maximize stakeholder reach, and promote awareness on company incorporation and compliance matters. • Measuring Awareness Impact; Establish metrics and tools to assess the effectiveness of awareness efforts, enabling data-driven improvements. 	<p>On-going activity</p> <p>31st Oct 2025</p>

Capacity Building & Inter-departmental Coordination.	<ul style="list-style-type: none"> • Training & Exposure for CRO Officers: Nominate officers of CROs for inter-departmental events to build capacity, broaden expertise, and foster institutional knowledge. • Structured CRO Coordination Meetings Hold fortnightly meetings of CRO Incharges with Commissioner LRD led by ED LRD and ROC to discuss and address issues, share insights, and align priorities. Moreover, meeting of CRO officer on fortnightly basis on areas such as knowledge sharing, company law, public dealing, and data analytics. • Session on every new concept or law/ rules/ regulations approved by the Commission: On monthly basis on the area such as company law / rules / regulations and new concepts. • Dedicated Legal Resource at CROs Assign dedicated personnel in each CRO and to manage litigation and court matters, ensuring timely and informed legal responses. • Meetings with relevant banking officials in co-ordination with PBA for digital CTC: Hold seminars /awareness session for banking professional to update them about acceptance of digital copies and updated regulation. 	<p>On-going</p> <p>-Do-</p> <p>-Do-</p> <p>30th Sep 2025</p> <p>Ongoing</p>
Strategic Vision and Performance Metrics	<ul style="list-style-type: none"> • Reporting on Data sharing with LEAs CROs to consolidate data with regard to information shared with LEAs during last three years and submit the report to focal person for LEAs with a request to present a complete organizational level review to the Commission. 	<p>31st Oct 2025</p>
Enhancing CROs Outlook	<ul style="list-style-type: none"> • Future outlook of CROs: To improve the overall service delivery and public interface of CROs, be restructured and upgraded in line with the successful Business Centre (BC) model. 	<p>30th Jun 2026</p>

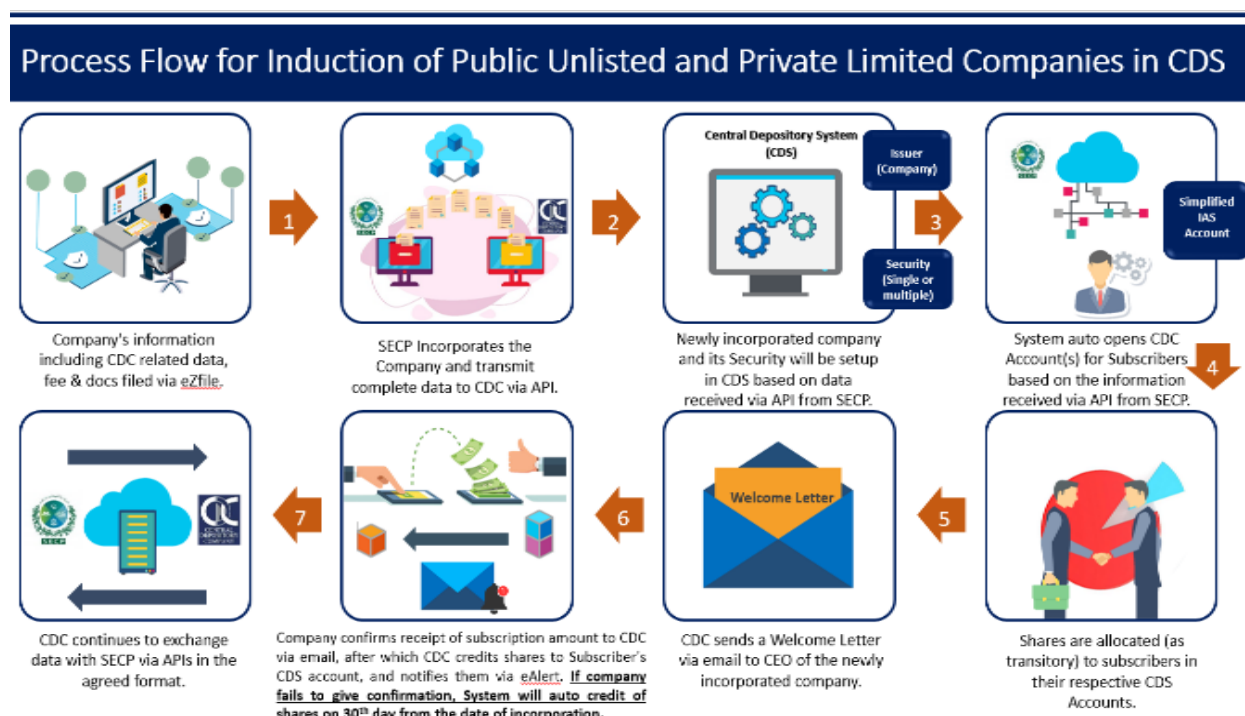
Chapter 3: Key Reforms and Transformations

This chapter provided detailed and insightful overview of the key reforms and transformative initiatives undertaken by the SECP to modernize the country's corporate regulatory framework and align it with international best practices.

Companies Regulations 2024: A major highlight was the introduction of the Companies Regulations 2024, which consolidated ten separate sets of regulations and streamlined compliance by reducing the number of prescribed forms from 75 to 28, making regulatory processes more efficient and user-friendly.

Digital verification of change of management of companies: One of the most impactful developments was the September 2024 mandate requiring all companies to file changes in management and directorships through eZfile only. This measure ensures the authenticity of such filings, mitigates the risk of fraudulent submissions, and greatly reduces the likelihood of disputes related to company control. The introduction of digital verification demonstrates SECP's commitment to enhancing corporate transparency and strengthening public trust in its systems.

Demat shares of newly incorporated companies: SECP has taken significant steps to modernize the capital market through the enforcement of dematerialization of shares. Effective March 2025, newly incorporated companies are required to issue their shares in book-entry form via the Central Depository Company (CDC). This move eliminates risks associated with physical share certificates and paves the way for a more secure, efficient, and transparent equity market structure.



Introduction of UDIN: Another milestone was the introduction of the Unique Document Identification Number (UDIN) for audit reports issued by ICAP members, a mechanism aimed at preventing counterfeit or unauthorized audit reports. Plans are also in progress to expand this requirement to practicing members of ICMAP.

Notification stipulating procedure for payment of subscription money: In March 2024, the SECP issued a notification requiring subscription money for shares to be paid in cash through formal banking channels within 30 days of incorporation.

Voluntary reporting of change in shareholding less than 25%: In March 2024, Commission clarified through a circular that changes in shareholding below the 25% threshold may be voluntarily reported, allowing registrars to better monitor corporate control structures.

Circular on Commission's Power to Call General Meetings: The SECP has also reinforced its authority to direct overdue general meetings upon receiving requests from aggrieved members or directors, thereby strengthening minority shareholder protections and overall corporate governance.

Cybersecurity Guidelines for eZfile Users: Cybersecurity was another important focus area, with the SECP issuing detailed guidelines for eZfile users in December 2024. These include instructions on safeguarding login credentials and protecting sensitive company data, in line with global cybersecurity standards.

B-Ready requirements and achievement: Several amendments have been proposed to meet Pakistan's commitments under the World Bank's B-Ready initiative, such as the inclusion of gender-disaggregated data, verification of Ultimate Beneficial Owners (UBOs), and collection of UBOs' dates of birth. These changes reflect SECP's broader efforts to align its regulatory framework with global standards for transparency, inclusivity, and anti-money laundering compliance. Another major achievement highlighted was Pakistan's ranking as 6th among 50 economies in the World Bank's 2024 B-Ready Report under the 'Business Entry' indicator, reflecting the tangible impact of these reforms.

CRD Manual: The Corporate Registry Department (CRD) Manual of SECP serves as a comprehensive guide outlining the standard procedures, legal interpretations, and operational protocols for CROs across Pakistan. It ensures uniformity in processing, promotes regulatory consistency, and provides reference tools for officers to effectively implement provisions of the Companies Act, 2017. Its regular updation shall reflect legislative changes and digital advancements. CRD Manual is a cornerstone of SECP's commitment to transparent, efficient, and service-oriented corporate regulation.

Other Reforms: The SECP also undertook extensive public outreach, conducting over 100 awareness sessions and issuing 24 press releases within a year. A variety of guidebooks have been published to support stakeholders in understanding and complying with regulatory requirements. These cover topics ranging from appointment of auditors and rights of shareholders to procedural guides for fee payment and online filings. Several additional guidebooks are in development, addressing complex areas like stock splits, capital issuance by unlisted companies, and the use of Employee Stock Option Schemes (ESOS).

The initiatives currently in progress are as under;

Recommendation	Concrete Steps	Deadline
Initiatives / Reforms underway	• Amendments in Companies Act, 2017	On-going
	• Shares in Book-entry-form for post-incorporation processes	30 th Oct 2025
	• Changes in cost audit regulations for inclusion of automobile sector	30 th Oct 2025
	• Consolidated Form A is under review, where companies will file only Form A for change of event.	31 st Dec 2025
	• Regulations for ponzi schemes and Multi-Level Marketing (MLM) Issues	31 st Dec 2025
	• Study international practices aimed at promoting corporatization and recommend measures to improve the corporatization landscape in Pakistan	30 th Nov 2025
	• Enhancing the ease of doing business in Pakistan by simplifying and making the related laws more understandable and accessible	31 st Mar 2026
	• Framework and awareness of agricultural promotion companies	30 th Nov 2025
	• Coordination with Board of Investment in terms of Registrations, Licenses, Certificates, and Other Permits (RLCOs) for the establishment of business facilitation centre, in line with the agenda of the government. Focal Person of SECP nominated and appointed.	31 st Aug 2025
	• Launch of following LEAP remaining phases:- i. Striking off companies by Registrar ii. Conversion of status of companies iii. Winding-up Procedure iv. Registration, renewal & rating of an intermediary v. Notice of Rectification of Register of Members/Directors vi. Notice of Court's Order	On going

	<ul style="list-style-type: none"> vii. Disallowing/Confirming the variation of the Rights of holders of Special Class of Shares viii. Application for registration as a group, alteration therein or designation as a group for taxation ix. Regulatory Approvals (Approx. 20 scenarios) 	
	<ul style="list-style-type: none"> • Collaboration with IPO registry for creating awareness through sending tailor-made message created by IPO for dissemination to newly incorporated companies. 	31 st Aug 2025
	<ul style="list-style-type: none"> • To initiate a monitoring mechanism for undelivered letters issued by CDC to newly incorporated companies since March 2025 and to maintain a record of undelivered welcome letters issued to newly incorporated companies since January 2025, for initiating appropriate action. 	30 th Sep 2025 & on-going

Chapter 4: SECP-XS Complaint Portal (WhatsApp Service)

This chapter focuses on the transformation of SECP's public grievance redressal framework through the implementation of integrated digital complaint channels. It highlights the operational architecture, user experience, and performance insights of three core platforms: the XS online complaint management system, the SECP WhatsApp interface, and the AI-based chatbot (SARA). Together, these tools form a digitally enabled ecosystem designed to simplify complaint lodging, enhance service responsiveness, and improve accountability across SECP's operations.

XS Platform – The Centralized Grievance Management Hub: The XS platform has emerged as the central system for complaint registration, tracking, and resolution within SECP. Built with role-based workflow capabilities, it enables structured assignment of cases, automatic escalations, and performance tracking. CROs and internal divisions can access real-time dashboards that display complaint categories, status updates, and resolution timelines. A clear disposal protocol, including tagging and categorization of issues, has allowed for improved resource allocation and faster turnaround on frequently recurring issues.

WhatsApp Integration – A Public-Facing Access Channel: WhatsApp, introduced as a public-facing gateway for quick inquiries and preliminary complaints, has become one of the most widely used access points. It provides a conversational interface for lodging concerns, requesting procedural information, and retrieving status updates. The system is planned to integrate with XS, ensuring that complaints submitted via WhatsApp can be assigned, tracked, and resolved through a unified backend. This convergence has helped reduce the burden on email and in-person channels.

SECP Chatbot (SARA) – Automating First-Level Support: The chatbot available on SECP's website is programmed to handle frequently asked queries related to company registration, compliance forms, and digital filing requirements. It allows users to self-navigate basic regulatory processes without having to wait for human intervention. The tool has been especially effective in dealing with after-hours inquiries, common understanding about eZfile procedures, documentation needs, and fee structures.

Measurable Improvements in Complaint Resolution: Data insights presented in the chapter show a marked improvement in complaint resolution rates post-implementation of these tools. Regions that were previously lagging behind in complaint disposal have shown considerable gains, thanks to training of CRO focal persons, clearer complaint categorization, and standardized resolution timelines. The introduction of follow-up alerts and resolution satisfaction scoring has also enhanced the quality of complaint handling.

Challenges and Areas for Improvement: Despite these advancements, challenges remain. CRO In-charges highlighted limitations and data issues such as;

- a) **Company profile data not updating post-form acceptance:** A recurring issue was reported where company profile data does not update even after the successful acceptance of statutory forms. This creates discrepancies between submitted

information and publicly visible records, leading to confusion for both companies and regulators.

- b) **Partial data reflections in company profiles:** In certain cases, only partial information is reflected in the company profile after form submission. This incomplete data update hampers the integrity of the registry and may affect downstream processes, including compliance and verification.
- c) **Processes stuck in DO portal with ‘Pending PIN Application’:** Several officers highlighted instances where processes land in the DO Portal with a persistent status of ‘Pending PIN Application’, despite all necessary actions being completed. This causes delays in final approvals and obstructs workflow continuity.
- d) **Accepted processes not appearing in ‘View Company Record’:** Some processes, after being duly accepted, fail to appear in the ‘View Company Record’ section. This omission affects transparency and prevents stakeholders from confirming the completion of changes or filings.
- e) **System-generated forms missing in view when sent for objection resolution:** It was observed that system-generated forms, when sent to objection, are not accessible under the view company record tab. This limits traceability and makes it difficult to review or refer to the form during objection resolution or audit.
- f) **Process bottlenecks in ARKCase workflow:** In the ARKCase system, certain processes are reportedly stuck at the second stage of approval, without progressing further. These workflow disruptions result in unresolved cases and increased follow-up requirements.
- g) **Financial Institutions portal not reflecting updated company data:** Another concern raised was the non-updation of company data in the FI portal, even after changes are processed in eZfile. This disconnect hinders financial institutions from accessing accurate information, affecting service delivery such as account opening or credit assessments.
- h) **Transfer of shares not reflected in system generated Form A:** Lastly, it was noted that share transfers conducted during the year are not being reflected in the auto-generated Form A, which compromises the accuracy of annual return documentation and may lead to compliance challenges.

Suggestions for Improvement & Way Forward

Based on the discussion, the following expanded action plan is recommended:

Recommendation	Concrete Steps	Deadline
Formation of a Dedicated Team from CRD and CROs for Enhanced Digital Service Delivery	<ul style="list-style-type: none"> • Assessment and Streamlining of Business Facilitation Channels: Conduct an assessment of SECP’s WhatsApp & SARA, to evaluate their effectiveness, user experience, and operational efficiency. Based on the findings, a unified and streamlined communication channel should be adopted as the single official mode of facilitation. 	31 st Oct 2025

		<ul style="list-style-type: none"> • Continuous Update of WhatsApp Response Logic Ensure that the content and logic of the WhatsApp interface are regularly updated to reflect changes in procedures, regulations, and user queries for accurate and timely information delivery. • Audit and Monitoring of Closed Complaints on SECP XS Utility Develop and implement an audit mechanism to periodically review and verify the resolution and closure of complaints submitted through the SECP XS utility, ensuring accountability and service quality. 	<p>Ongoing</p> <p>31st Dec 2025</p>
Proactive Resolution	Issue	<ul style="list-style-type: none"> • Root Cause Analysis of LEAP issues; Analysis of root causes of the most frequent complaints (e.g., "Filing of Returns," "eZfile related concerns") 	30 th Sep 2025

Chapter 5: Brief Overview of CRD Manual

This chapter introduces a foundational shift in the operational governance of SECP's Corporate Registry Department through the planned rollout of a comprehensive Registration Manual and an updated set of Standard Operating Procedures (SOPs). The manual has been designed to bring uniformity, transparency, and accountability to the practices followed across all CROs.

1. **Purpose and Vision of the CRD Manual:** The CRD Manual marks a landmark initiative—developed for the first time in the history of the Corporate Registry Department—to enhance the performance and procedural integrity of the Department, CROs, and the Business Centre. The manual outlines core principles, responsibilities, and regulatory procedures, ensuring that all stakeholders work under a shared understanding of service standards and legal compliance. Its primary aim is to streamline operations and foster consistent, transparent, and efficient service delivery across all CROs.



2. **Promoting consistency and eliminating variation in regulatory decisions:** One of the central objectives of the manual is to eliminate inconsistencies in regulatory interpretation and decision-making across jurisdictions. In the past, CRO staff often relied on legacy practices, informal guidance, or individual understanding, leading to conflicting decisions on similar filings. The adoption of the manual ensures that every stage—from document intake to adjudication—follows predefined procedures, supported by structured templates and clearly defined rules, which promote legal uniformity and procedural fairness.
3. **Scope and structure of the Manual:** The manual comprises detailed chapters that address critical operational areas for registrars and officers. It serves as a training tool, a compliance checklist, and a reference guide for managing company incorporation, post-incorporation processes, and legal scrutiny. Additionally, it incorporates the organogram of the Corporate Registry Department, promoting a clear understanding of roles, reporting lines, and communication channels. Key principles such as standardization, uniformity, transparency, and legal clarity are embedded throughout the document.

4. **Statutory return profiling and risk-based review:** A significant feature of the manual is the profiling of 23 statutory returns and financial statements based on risk assessment, statutory timelines, disposal deadlines, and approving authorities. Each return is reviewed in light of relevant legal provisions, identifying red flags that require elevated scrutiny. This profiling ensures that compliance officers are equipped to evaluate filings thoroughly and consistently, strengthening regulatory oversight and public trust.
5. **Decision-making framework and handling of disputes:** The manual lays out the decision-making process for accepting or refusing registration of returns and provides a detailed process flow for cancellation or de-registration of documents. It offers special guidance on how to handle disputes related to directorship or shareholding, which are often sensitive and complex. The goal is to equip officers with a well-structured legal framework to ensure decisions are legally sound, fair, and defensible.
6. **Monitoring mechanism and performance oversight:** The manual includes a section dedicated to performance monitoring, highlighting tools and mechanisms available to the Divisional Head and the Registrar of Companies. Real-time tracking of officer performance in CROs and the Business Centre is encouraged, alongside regular reviews, to improve efficiency, promote accountability, and support corrective actions wherever needed.
7. **Examination of applications and compliance evaluation:** Specific responsibilities of CRO and officers of Corporate Registration Department in handling various applications under the Companies Act 2017 and associated regulations are also detailed. The manual outlines critical checkpoints and evaluation criteria to ensure that applications are scrutinized carefully and disposed of in compliance with the law. This focus on procedural integrity helps reduce errors and strengthens the regulatory foundation of the registry.
8. **Cross-departmental coordination and internal communication:** To ensure smooth coordination across SECP's internal divisions, the manual provides detailed guidance on interactions with other departments, including PLAD, Adjudication, Supervision, Licensing Department (LD) and Mergers and Restructuring Department (MRD). This section clarifies the communication protocols, document sharing processes, and legal considerations required to ensure institutional alignment and timely resolution of inter-departmental matters.
9. **Development of SOPs and process standardization:** The manual also emphasizes the importance of clear, documented procedures through the development of Standard Operating Procedures (SOPs) for critical operational areas. These include flagging/de-flagging, shareholder disputes, CRO visitor management, and complaint handling across SDMS, PCP, and XS. The manual further outlines the legal process for appeals, ensuring due process and transparency in grievance redressal.
10. **Institutionalizing a rule-based culture:** In conclusion, the CRD Manual consolidates fragmented practices and undocumented procedures into a single codified reference covering the entire company lifecycle—from registration to regulatory oversight. It

enables CROs to apply standardized processes in scrutiny, return rejections, rectifications, share transfers, and revival applications. Most importantly, the manual reflects SECP's unwavering commitment to building a rule-based, service-oriented regulatory culture, where actions are legally sound, consistently applied, and transparent to all stakeholders.

Suggestions for Improvement & Way Forward

Based on the discussion, the following expanded action plan is recommended:

Recommendation	Concrete Steps	Deadline
Implementation, updating & integration of CRD Manual	<ul style="list-style-type: none"> • Approval of the CRD Manual Approval of the CRD manual from the Commission for its implementation at all CROs & BC. 	Done (17 th July 2025)
	<ul style="list-style-type: none"> • CRD Manual and eZfile integration Integrate the manual's SOPs regarding statutory returns and checklists directly into the eZfile system as validation rules and process flows. 	31 st Dec 2025
Training of Registrars on CRD Manual	<ul style="list-style-type: none"> • Training of the Registrars Train all the Registrars on the CRD manual for its implementation and understanding, to ensure consistent practices, across all CROs. 	31 st Aug 2025

Chapter 6: Same Day Account Opening, Financial Institutions Portal, Electronic Mortgage Register

This chapter represents a strategic effort to create a synchronized regulatory-financial interface—one that enhances financial inclusion, reduces transaction costs, and improves the trust and efficiency of business formalization in Pakistan. The three key initiatives under review are:

1. Same Day Corporate Account Opening via eZfile
2. Financial Institutions (FI) Portal
3. Electronic Mortgage Register (EMR) Portal

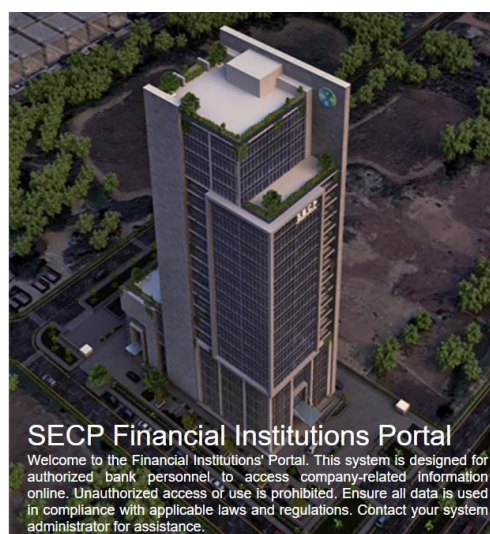
The purpose is to eliminate delays in financial onboarding, improve access to real-time company data for banks, and offer digital verification of corporate mortgages to promote transparency, reduce risk, and foster trust among stakeholders.

Same-Day Account Opening: The same-day account opening framework is being developed in collaboration with leading commercial banks and the State Bank of Pakistan (SBP), allows newly incorporated companies to open business bank accounts instantly upon issuance of their certificate of incorporation. This



would eliminate the previous lag caused by manual verifications, inconsistent documentation standards, and branch-level discretion. Integration between SECP's company registration system and designated bank APIs shall allow automatic retrieval of incorporation details, directors' particulars etc. As a result, the time taken for corporate onboarding into the financial system will be dropped from several days to a matter of hours.

Financial Institutions Portal: In parallel, the FI Portal has been deployed to enable authorized financial institutions to securely access non-confidential company data, verify legal status, and confirm regulatory standing in real time. Through controlled access, banks can validate particulars such as company type, incorporation date, directors' list, reducing reliance on physical documents and minimizing the risk of forgery or misrepresentation.



Electronic Mortgage Register: Another major development is the Electronic Mortgage Register, which digitizes the registration of charge documents and offers instant visibility of encumbrances on corporate assets. Through a user-friendly dashboard, banks can view existing charges, and track discharge or modification statuses. The system promotes transparency in credit transactions, speeds up collateral-based lending, and strengthens the enforceability of creditor rights.

CRO in-charges highlighted practical outcomes of these systems, such as a significant reduction in repeat verification requests, faster document processing, and improved coordination with financial institutions.



ELECTRONIC MORTGAGE REGISTER

Proposals are underway to enhance coordination & interconnectivity with the FIs. A phased automation plan is also being considered to extend these services to microfinance institutions and development finance banks and intermediaries. Further, banks are being encouraged to onboard more branches under the same-day framework and align their back-office procedures with SECP's digital workflow.

Suggestions for Improvement & Way Forward

Recommendation	Concrete Steps	Deadline
Review and Strengthening of Financial Institution (FI) Payment Framework	<ul style="list-style-type: none"> • Reassessment of Existing Payment Terms of Financial Institutions (FIs) Conduct a comprehensive review of the current payment arrangements with FIs. Based on the findings, propose the expansion of the pre-payment facility to cover all FIs to ensure timely settlement 	31 st Oct 2025
	<ul style="list-style-type: none"> • Recovery of Outstanding Dues from FI Portal Users Initiate the recovery of pending dues from users of the FI Portal. This may include issuing reminders, setting clear payment deadlines, and applying appropriate penalties in case of continued non-compliance. 	-Do-
	<ul style="list-style-type: none"> • Development and communication of standardized procedure for users of FI Portal Formulate a detailed mechanism and SOP for managing payments and recoveries. This should include timelines, responsibilities, payment methods, and escalation protocols. Once finalized, the procedure should be formally communicated 	-Do-

	to all relevant stakeholders for consistent implementation.	
Facilitation of Sahulat Account Opening	<ul style="list-style-type: none"> Coordination with State Bank of Pakistan (SBP) and Pakistan Banks' Association (PBA) so that Banks should be enabled to open Sahulat Accounts with minimum required information. 	31 st Oct 2025 & Ongoing
Standardization of Documentation	<ul style="list-style-type: none"> Issuance of circular on the format of a Board Resolution to be adopted by the companies, to support account opening processes. 	30 th Sep 2025

Chapter 07. Concluding Remarks

The 7th Registrars Conference 2025 successfully underscored the SECP's unwavering commitment to its transformative agenda: "From Paper to Platform." The presentations and discussions painted a clear picture of a modern, forward-looking regulator that is leveraging technology, particularly AI and deep system integrations, to create a world-class corporate registry. Throughout the conference, dedicated sessions were allocated for interactive Q&A. These sessions provided a crucial platform for CROs and senior management to engage in open dialogue, brainstorm solutions to common challenges, and provide direct feedback on the initiatives presented. The discussions delved deeper into the operational realities of implementing the proposed reforms. These interactive segments were invaluable for fostering a sense of shared ownership and ensuring that the strategic vision presented was grounded in practical applicability.

Major takeaways include the imminent launch of an AI-driven name reservation system, the mandatory dematerialization of shares for all companies, and the ambitious goal of same-day bank account opening. The conference also acknowledged the significant operational and technical challenges that lie ahead. The detailed roadmaps and recommendations presented for each initiative provide a clear and actionable path forward.

The event concluded with closing remarks from the Chairman, who reiterated the importance of collaboration, continuous improvement, and a stakeholder-centric approach, setting a clear, innovative, and ambitious direction for the future of Pakistan's corporate sector.
