



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN
PENSION DEPARTMENT

No. SECP/PD/CIRCULAR/2025

July 16th, 2025

Circular No. 17 of 2025

Subject: Issuance of Key Fact Statement by PFMs to Investors

The Securities and Exchange Commission of Pakistan (the "Commission") in exercise of its powers conferred by Section 282 (B) read with Section 282 (D) of the Companies Ordinance, 1984 (XLVII of 1984), hereby directs that all Pension Fund Managers (PFMs) to incorporate a Key Fact Statement (KFS), as second to the title page of the Offering Document (OD), in order to achieve clarity and ease of understanding for the investors enabling them to make a well-informed investment decision.

KFS shall be subject to following minimum requirements;

1. PFMs shall provide approved version of KFS for each Pension Fund before soliciting new investments.
2. PFMs shall ensure that KFS for each Pension Fund is readily accessible to investors on its website/ online portal.
3. PFMs shall ensure that at the point of sale, including through PFM's website or a third-party digital portal/website, investors acknowledge receipt of the KFS and confirm their review and understanding of its contents. This acknowledgment shall be obtained by requiring investors to sign off on the Investment Form for physical transactions and, in the case of online investments, through a pop-up screenshot incorporating a checkbox mechanism that allows participants to either accept or decline after review and validation. The investment form/ pop-up shall clearly state the following with a check box;

"I acknowledge that I have received and read the Key Fact Statement at the time of investment, and I have read and understood the terms and conditions to the best of my knowledge and have retained copy of the same."

4. PFMs shall ensure the validity/correctness of the KFS including the incorporation of any subsequent amendments due to change in the fundamental attributes.
5. PFMs shall continue to make available updated copy of OD's on its official website and other digital means.
6. Template for KFS is attached as **Annexure I** to this Circular; and
7. These requirements shall be applicable from August 15, 2025. The PFMs shall submit supplemental constitutive documents to the Commission for information within one week from the date of amendments in terms of Regulation 67J (4) of the Non-Banking Finance Companies and Notified Entities Regulations, 2008.

Musarat Jabeen
Divisional Head
(Pension Department)

Distribution:

1. Chief Executive Officers of all Pension Fund Managers;
2. Mutual Funds Association of Pakistan; and
3. Trustees of Pension Funds.



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN PENSION DEPARTMENT

Template for KFS

Annexure I

Key Fact Statement

Name of Pension Fund

Managed by (Name of Pension Fund Management Company)

Disclaimer

This document is not a replacement of Offering Document (OD). Before you invest, you are encouraged to review the detailed features of each sub-fund in the Fund's OD and/or Monthly Fund Manager Report.

1. Investment Overview

- (i) Investment objective [disclosed separately for each sub-fund]
- (ii) Investment Policy: [disclosed collectively]
 - a. Allocation policy: [briefly state the categories of instruments the fund will invest in].
 - b. Performance Benchmark [disclosed separately for each sub-fund]
 - c. Shariah Compliance [if applicable]
- (iii) Launch date
- (iv) Minimum contribution amount
- (v) Management fee [disclosed separately for each sub-fund]
- (vi) Subscription/ Withdrawal Days and Timing

2. Risk Profile and Product Suitability

- (i) Who is this product suitable for?
 - a. Return objectives e.g. long-term retirement saving.
- (ii) Risk profile of the fund. [State risk profile for each type of allocation scheme e.g. higher volatility, medium volatility, low volatility and lower volatility].
- (iii) Fund's investment risks. [Only disclaimer may be added]
Disclaimer: For details refer to clause () (Risks) of the OD.
- (iv) Any other key information peculiar to the product which would help investors to determine if the product is suitable for them.

3. Withdrawals, drawdowns and benefits

- (i) Minimum retirement age. [When can participants choose to retire?]
- (ii) Options available to participants upon retirement? [Briefly explain the options available as per VPS Rules, 2005].
- (iii) Early withdrawal conditions and implications [Briefly explain when early withdrawals are permitted and the tax implications of early withdrawals]
- (iv) Any other key information which would help investors to determine if the product is suitable for them.

4. Brief information on the product charges

1. Front-end load	Distribution channel	Percentage
	Direct Investment through PFM	
	Digital Platform of PFM/ Third party	

Total Expense Ratio (TER)

Participants are advised to consult the Fund Manager Report (FMR) of the respective Pension Fund for the latest information pertaining to the updated TER.



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5. KEY STAKEHOLDERS

- a. Pension Fund Manager (Name and contact details)
 - b. Trustee (Name and contact details)
 - c. Shariah Advisor (if applicable – Name and contact details)
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