



PAKISTAN TELECOMMUNICATION AUTHORITY
Headquarters, F-5/1, Islamabad
<http://www.pta.gov.pk>

Enforcement order under section 23 of the Pakistan Telecommunication (Re-organization) Act, 1996 against Pakistan Telecom Mobile Limited (PTML-Ufone)

No: PTA/Enf/Subscriber Verification/4/2020/

Date of Show Cause Notice:	10 th February, 2020
Venue of Hearing:	PTA HQs, Islamabad
Date of Hearing:	23 rd June, 2020

Panel of Hearing

Maj Gen. Amir Azeem Bajwa (R) :	Chairman
Dr. Khawar Siddique Khokhar :	Member (Compliance and Enforcement)
Muhammad Naveed :	Member (Finance)

DECISION OF THE AUTHORITY

This enforcement order will dispose of Show Cause Notice (the “SCN”) dated 10th February, 2020 issued to Pakistan Telecom Mobile Limited due to Unlawful/illegal sale and issuance of SIMs through various sale channels; Unauthorized sale of SIMs through kiosks activities (Door to Door sale) without prior permission of the Authority; and Sale of SIMs below Minimum Sale Price (MSP) of Pak Rupees 200.

1. Facts of the case:

1.1 Precisely stated Pakistan Telecom Mobile Limited (PMTL-Ufone) (the “licensee”) is engaged in the business of cellular mobile services in Pakistan pursuant to non-exclusive license No.MCT-06/WLL&M/PTA/2014 dated 8th April, 2014 and license No.NGMS-03/WLL&M/PTA/2014 dated 21st May, 2014 (the “license”) issued by the Pakistan Telecommunication Authority (the “Authority”) to establish, maintain and operate licensed system and to provide licensed cellular mobile services in Pakistan on the terms & conditions contained in the license.

1.2 Under the terms and conditions of the license, the licensee is obligated to comply with the provisions of the prevailing regulatory laws comprising the Act, all the Rules, Regulations made / framed / issued under the Act, determinations of the Authority and the terms and the conditions of the license. More so, the licensee as per license condition 6.7.11 of the license is under an obligation to activate SIM after proper verification as per applicable regulations / directives / standard operating procedures of the Authority. While performing its functions under the provisions of the Act, the Authority has promulgated Subscribers Antecedents Verification Regulations, 2015 (the "Regulations") for the registration and maintenance of their subscribers' antecedents through proper documentation and verification through NADRA Database in accordance with procedures specified in these Regulations. In order to further streamline the process of SIM sale and activation through Biometric Verification, the Authority has issued Standard Operating Procedure (SOP) on SIM Sale and Activation through Biometric Verification. This SOP has been communicated to the all the cellular mobile operators including the licensee vide directive dated 2nd April, 2019 for strict compliance and implementation.

1.3 Considering the sensitivity and seriousness of the issue, particularly the use of issued SIMs being used for grey trafficking, the Authority vide letters dated 27th August, 2019, 8th October, 2019, 14th November, 2019 and 22nd January 2020 duly informed the licensee with regards to the violations on its part and was further directed to take reasonable measures against franchises / retailers / sellers involved in selling / activating SIMs fraudulently which were purportedly being used for illegal activities. These communications were issued to the licensee on a monthly basis for blocking of SIMs being used in grey trafficking.

1.4 In addition, as to ensure regulatory compliances, the Authority carried out a survey in December, 2019. As a result of the survey, it revealed that the licensee was selling SIMs below Rs.200 contrary to PTA's determination dated 7.11.2016. It was also observed that the licensee, its franchisee/retailers were involved in Door to Door / Kiosks activity without prior approval of the Authority.

1.5 Thus, as a consequence thereof, the Authority issued a SCN dated 10th February, 2020 for the above referred contraventions requiring it to remedy the contravention as under:

- i. Block SIMs connection issued contrary to the aforesaid SOP, direction and Regulations with immediate effect.
- ii. Terminate agreement with sellers, who are involved in issuance of unauthorized SIMs in accordance with regulation 13 of the Subscriber's Regulation with immediate effect
- iii. Provide status of such blocked SIMs as well as terminated agreements with the seller within three (03) days of issuance of SCN
- iv. Stop selling of SIMs contrary to Determination
- v. Immediately stop door to door /Kiosks activity
- vi. Provide steps taken in order to eliminate issuance of SIMs through misuse of Biometric Verification System (BVS) with thirty (30) days of the issue of SCN.

2. Reply filed by the licensee

2.1 Interim Reply to the SCN

2.1.1. The licensee replied to the SCN in two parts i.e., interim reply; and ii) reply to the SCN in detail. An interim reply was submitted vide letter dated 19th February, 2020 wherein the licensee lists down a summary of the actions taken in the following manner:

S#	Sale Outlets	Sep- 19	Oct- 19	Nov- 19	Dec- 19	Total
1	<u>Franchisee</u>					
A	Terminations	1	3	2		6
B	100 K Fine & Strict Warning				1	1
C	50 K Fine & Strict Warning		5	2	1	8
D	25 K Fine & Strict Warning		24	8	13	45
E	Strict Warning	23	23			46
	Total	24	55	12	15	106
2	<u>Retailers</u>					
	Termination	42	160	48	52	302
3	G-Total	66	215	60	67	408
	Reported to PTA on	22-Oct-19	21-Nov-19	2-Jan-20	7-Feb-19	

- Moreover, it is submitted that as per our record all the SIM connections mentioned in the aforementioned lists were issued as per PTA's SOP on SIM Sale and Activation through Biometric Verification dated 2 April 2019.
- Moreover, PTML has already blocked all SIMs provided in the lists in compliance to the direction of the Authority, which are entirely based on suspected activities in terms of their involvement in grey traffic as per PTA's analysis. However, some of the blocked numbers were restored in response to the complaints received directly or through CPD, PTA. A summary of the present status of the listed Numbers is as under:

S #	Status Category	List-1	List -2	List-3	List-4	Total
		1st Half Sep 19	2nd Half Sep 19	Oct-20	Nov & Dec 19	
1	Blocked	6007	1593	1620	44954	54174
2	Ported Out	147	59	143	218	567
3	Restored	159	26	128	755	1068
	Total	6313	1678	1891	45927	55809

2.2 Final reply to the SCN

2.2.1 The licensee vide letter dated 9th March, 2020 submitted his final response to the SCN. The crux of the relevant submissions made thereof are reproduced below:

1. PTML has complied with all direction of PTA and have taken all the remedial measures advised by the PTA.
2. PTML is fully compliant to the provisions of the Pakistan Telecommunication (Re-Organization) Act (1996) (the "Act"), Provisions of the license, Pakistan Telecommunication Rules, 2000 (the "Rules"), Pakistan Telecommunication Authority (Functions & Powers) Regulations, 2006 ("F&P Regulations"), Subscriber Antecedent Verification Regulations, 2015 (the "Subscriber's Regulation") and Standard Operating Procedure on SIM Sale and Activation through Biometric Verification dated 2nd April 2019 ("SOP") as amended from time to time, Telecom Consumer Protection Regulations, 2009 (the "Consumer Regulations"), PTA's Order dated 7th November 2016 regarding Minimum Sale Price for a Mobile SIM (the "Determination") Collectively, the above legal and the regulatory instruments may be referred to as the "Relevant Laws").
3. PTML has taken all the steps at its own cost to curb the menace of grey traffic to the satisfaction of PTA, especially in the year 2019 and also in the year 2020. Nevertheless, PTML unequivocally assures its continuing to PTA and the Law Enforcement Agencies (the "LEA") assistance for controlling any act of suspect illegal grey traffic.
4. The SCN has purportedly been issued based on various surveys conducted by PTA; unbeknown to PTML's participation/representation/engagement, therefore, PTML has been condemned unheard against the basic principle of natural justice, i.e. *Audi Alterm Palterm*.
5. PTML takes pride in submitting that it has always strived, amongst other things, to ensure effective compliance of the license conditions and the applicable laws/rules/regulation for orderly and healthy growth of the company as well as the mobile cellular telecommunication, at the same time, be a part of fair competition and protecting the interests of its subscribers, without any exception.
8. No SIM has been issued, verified and activated in violation of Regulation 4(2). Notwithstanding, in the cases of merely suspected violation of the prescribed procedures, PTML has immediately taken strictest possible actions as required by PTA, including blocking of such suspected SIMs and even to the extent of terminating the alleged sales channels (franchisees and retailers), among other things.
10. In terms of Regulations 5, 7, 8, 9 and 10 of Subscriber's Regulations pertaining to "Minimum Requirements for Sale of New SIM(s)," "Maximum Number of SIM(s) to be issued to individual CNIC holder," "SIM(s) Activation upon Verification," "Verification and Activation of SIM(s) through NADRA," and "Activation of SIM(s) for Foreign Nationals," PTML has never contravened any of the above- referred provision, and its SIMs are being issued/sold/verified in accordance with the prescribed procedure.
11. The process of subscriber verification and SIM activation as implemented by PTML in accordance with Regulations/Directives/SOPs cannot be tampered at any stage. Further, PTML discourages such fraudulent activities at all levels whether it be a Franchisee and/or Retail Sales Channel, and repeatedly issues warnings, imposes fines and terminates in case of mere suspicious activity on the

part of its sales channels and the same is submitted as and when required by the Authority. Furthermore, whenever the Authority identifies the suspected SIM being used in grey traffic, PTML immediately blocks and reports to the Authority, which squarely falls within the ambit of compliance to the aforesaid Regulation. Against this background, it is of the utmost importance to draw your kind attention to Subscriber's Regulation 8(3) wherein the Authority has clearly outlined that "The subscriber of each SIM shall be responsible for its use, and shall ensure that it is not misused for any fraudulent, obnoxious, or unsolicited communication".

12. PTML has never acted in contravention of clause 4, 5, 6, 7, and 8 of SOP. That is, a potential subscriber can only buy/activate, get a duplicate, change its ownership, and verification of SIM and/or MNP, only by visiting a BVS enabled Sale Outlet having unique IDs, where he/she has to provide a valid Computerized National Identity Card (CNIC) to Sale Agent, place his/her Thumb/Finger on BVS scanner for Verification from NADRA and agreeing to the Authority's issued Terms & Conditions -Standard Contract for purchase of SIM Connection. It is only subsequent to a Successful Verification; a SIM connection is activated, replaced, disowned, among other things. Therefore, the alleged contravention of the all relevant Regulations/Directives/SOPs issued by the Authority from time to time is vehemently denied.
13. PTML appreciates the Authority's efforts to curb the menace of grey traffic by conducting surveys, raids, detecting suspected grey SIMs use and confiscating of suspected SIMs, which might have been used in any illegal activity. PTML has been provided SOP for verification and activation of SIMs whereas the data given by PTA pertains to the use and alleged misuse of SIMs. The Authority did not establish the claimed violation of SOP. Nonetheless, it may be appreciated by the Authority that as soon as PTML was informed about the suspected sales channels, it promptly issued warnings, imposed financial penalties, terminated suspected sales channels and has blocked suspected SIMs in accordance with the Authority's directions. A statistical summary of actions already taken by PTML from September 2019 and December 2019 is provided below:-

Actions against Sales Channels in year 2019

S#	Sale Outlets	Sep-19	Oct-19	Nov-19	Dec-19	Total
1	<u>Franchisee</u>					
A	Terminations	1	3	2		6
B	100 K Fine & Strict				1	1
C	50 K Fine & Strict Warning		5	2	1	8
D	25 K Fine & Strict Warning		24	8	13	45
E	Strict Warning	23	23			46
	Total	24	55	12	15	106
2	<u>Retailers</u>					
	Termination	42	160	48	52	302

3	G-Total	66	215	60	67	408
	Reported to PTA on	22-Oct-19	21-Nov-19	2-Jan-20	7-Feb-20	

Blocking of SIMs identified/suspected by PTA

S#	Status Category	List-1	List -2	List-3	List-4	Total
		1st Half Sep 19	2nd Half Sep 19	Oct-20	Nov & Dec 19	
1	Blocked	6007	1593	1620	44954	54174
2	Ported Out	147	59	143	218	567
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	Total	6313	1678	1891	45927	55809

SIMs confiscated in Raids conducted by PTA

14. In the SCN, PTA has alleged 44,962 numbers as illegal SIMs, but it is noteworthy to mention that PTA subsequently provided a list of 55,809 numbers instead. Keeping in view the above statistics and analysis, it appears that relevant officer of PTA has prepared and issued the SCN in a hasty manner merely to victimize PTML at any cost and manner (Emphasis added).
15. PTA may be cognizant of the fact related to individual/groups who are primarily engaged in theft of identity data, which is solely held by NADRA. If PTA and the LEAs do not concentrate on the core issue i.e. "identity theft," either at NADRA's end, or through the actual/potential misuse of the biometric identification of the Pakistani Citizens; unscrupulous elements are likely to continue their activities with impunity. Notwithstanding, in order to support PTA's ongoing actions against suspected illegal use of SIM, PTML has specifically taken actions and submitted full compliance to directions issued by PTA vide Letters dated 27th August 2019, 8th October 2019 and 14th November 2019. It may be appreciated the suspected SIMs count reported by PTA itself evidence a sharp decline in the rate of alleged illegal activities at all levels as reproduced below:

S No.	PTA Letters	Month in which SIMs were Blocked as per				
		Sep-19	Oct-19	Nov-19	Dec-19	Jan-20
1	8-Oct-19	8113				
2	14- Nov-19		16891			
3	22-Jan-20			28464	16224	
4	14-Feb-20					9778
	Total	8113	16891	28464	16224	9778

16. It is imperative to mention that it was PTML that moved to PTA and reported the incidents of apparently unwanted activations without the consent of

subscriber at unusual rate with respect to time and device used for biometric verification. It is on this initiative that, a Joint Working Group ("JWG") (already constituted by the Ministry of Interior ("MOI") in 2013 for evolving biometric verification of SIMs) was re-activated by PTA on 3rd October 2016 to review the performance of BVS system for sale and activation of SIMs on 6th October 2016. In the meeting, the then DG (Enforcement) apprised the participants that since inspection of the BVS in August 2014 and re-verification exercise in 2015, the BVS worked well and no incident of bypassing the system was reported. However, CMOs, particularly, PTML highlighted that for the last few months, during the data analysis by CMOs, an unusual trend of SIMs activation from certain machines has been reported. Upon request, PTML's representative briefed the participants about usual rate of SIMs activation per hour per BVS ID/Machine in the meeting held on 6th October 2016. It was also pointed out that the series of CNICs against which SIMs have been issued related mostly to Punjab and that too female which was against the current trend of 82 to 85% activation of SIMs against male CNICs. It was PTML, which suggested introducing a cap of 15 activations per hour per machine ID. Subsequently, on 26th October 2016, a meeting of JWG was held at PTA wherein the CMOs and FIA were tasked to undertake a multipronged approach including technical as well as on-ground surveys/inspections. In specific, CMOs were advised to carry out BVS data analysis and report unusual activities to PTA for onward taking up with FIA. In addition, CNIC numbers with abnormal sale activation were to be shared with NADRA for subsequent analysis to ascertain whether stored biometric information is being used or otherwise. Subsequently, neither meetings of the JWG were scheduled and rescheduled on 11th January 2017 and 12th January 2017, but were held nor any conclusion/feedback was shared with the CMOs.

17. With reference to the Authority's Determination dated 7th December 2016 (the "Determination"), regarding Minimum Sale Price for a Mobile SIM at the retail level Rs.200, PTML has duly communicated the Determination to its respective sale channels and has required full compliance with the same in letter and spirit. PTML has never allowed its sales channels at any level to sell SIMs below the price set out by the Authority. It may, nevertheless, be noted that SIM is a product of the company and where its franchisees and retailers, who actually act as resellers, may be swayed by the market forces and unable to adhere to the Determination. This has been well acknowledged by the Authority vide its Letter dated 25th September 2018, as follows:

"2. [...] however, it has been observed that CMOs could not implement the decision of the Authority in letter and spirit with regard to ensuring the sale of SIMs at the minimum of Rs.200. PTA's enforcement surveys have reported several instances where sale channels at the retail level are selling SIMs below the minimum sale price due to discounts being offered by retailers and competitive pressure in the market.

3. Foregoing in view, the Authority is considering reviewing the minimum sale price of SIM. In this regard, CMOs are requested to submit their comments/suggestions on the revisions of the minimum price of SIM within fifteen days of the issuance of this letter".

18. In the circumstances, it is respectfully prayed that:

- a) the SCN may be withdrawn in view of PTML's unequivocal commitment

to adhere to all Relevant Laws, (including but not limited to the provisions of the Act/Rules/Regulations/Directives/SOPs made thereunder) to achieving full compliance; and also enforcement measure taken by the entity without any condition with further assurance to adhere to all lawful direction of PTA and to curb the practice of suspected unauthorized/illegal use of SIMs to protect its own business as well as national interests;

- b) in the event, the Authority still decides to proceed with the baseless, biased, discriminatory, and vindictive allegations leveled in the SCN; an opportunity of personal hearing may please be granted to further apprise the Authority of PTML's compliance and the steps taken to fulfill the directions of the Authority.

3. Hearing proceeding before the Authority:

3.1 The Authority scheduled hearing on 23rd June, 2020. On the said date, the licensee appeared before the Authority through Mr. Hamood ur Rehman, Advocate Supreme Court of Pakistan, (legal counsel) and Mr. Shafqat Usmani, while Mr. Hamid Bashir Alvi (GR & Regulatory Affairs Ufone), Mr. Muhammad Rizwan (Legal team Ufone), Mr. Naveed Khalid Butt (Regulatory Affairs Ufone), Mr. Rafique Ahmed (Legal and Corporate Ufone), Ms. Zahida Awan (GCLO/PTCL) and Mr. Rashid Khan, CEO Ufone, attended the hearing through video conference.

3.2 During the hearing, the learned counsel representing the licensee reiterated the stance of the licensee as put forth in the above referred replies. He further submitted that the licensee in response to the letters received from the Authority for blocking of SIMs had taken timely action by blocking of SIMs and issuing necessary instructions to its franchisee/retailers for following the regulatory regime, regulations, SOPs and directions of the Authority. Therefore, the impression of the Authority on their being stagnation on part of the licensee for taking appropriate action against its franchisee/retailers was incorrect. He went on to argue that the issue of issuance of grey SIMs and their subsequent blocking was an incessant issue concerning the entire telecommunication industry and affecting all cellular mobile operators.

3.3 The learned counsel for the licensee further highlighted that as a cellular mobile operator, it exercises limited power and control over its franchisee/retailers for ensuring compliance with applicable laws.

3.4 With regards to the issue of door to door/ kiosk SIM selling activities without prior approval of the Authority, the learned counsel contented that no such activity had been undertaken by the licensee without prior approval of the Authority. In response to the contravention of selling of SIMs below the price of Rs. 200, it was argued that since the determination of the Authority was under process of review, thus it is no longer in field and the licensee was free to sell the SIM keeping in view the prevailing market conditions.

4. Findings of the Authority:

4.1 Matter heard and record perused. After careful examination of record and arguments advanced by legal counsel during hearing, findings of the Authority are as under:

4.1.1 Licensee Action against its Franchises/Retailers

a. The licensee vide its replies to the SCN submitted that in aggregate action has been taken against 243 franchises and 566 retailers for violating Regulations, SOP and the determination. As per the licensee's submissions, a total of 9 franchisees and 566 retailers had been terminated. Another 234 franchises had been warned or fined for an amount varying from Rs.25,000/- to Rs.100,000/-. In this connection, the most relevant question which needs to be determined is whether the licensee has taken adequate steps commensurate with the seriousness of the issue. Unfortunately, the answer to this question is in the negative. Use of grey SIMs in illegal activities and heinous crimes is a national security concern. Moreover, the menace of grey SIMs and trafficking has been causing loss to the licensed operators and national exchequer on regular basis. The Authority, in order to curb this problem has taken and is continuously striving for implementing regulatory provisions to bring the offenders to justice. It is appropriate at this juncture to highlight that the Authority has issued several letters to the licensee on monthly basis informing him about the sale of SIMs being used for grey trafficking, however, despite the continuous letters, the licensee took actions only against the sale channels pointed out by PTA.

b. The list shared by the licensee pertaining to the actions taken against franchisee and retailers shows that "no action has been taken" against 15 franchisees despite the fact that they were involved in selling SIMs used in grey trafficking. Moreover, in its response, the licensee has informed action against 55,809 SIMs although the total SIMs conveyed with the Show Cause Notice were 70,928. Hence, fate of 15,119 SIMs is still not clear. Thus, the practice in essence adopted by the licensee for stopping the sale and issuance of grey SIMs has been "reactive" rather than being a "proactive" one.

c. The licensee has paid inadequate attention to the fact that sale of grey SIMs can have profound ramifications for the subscribers and other stakeholders that can manifest in the form of terrorism, concerns for national security, financial fraud, grey traffic, defamation, cyber fraud and numerous other illegal activities. Furthermore, the record also highlights that the Federal Investigation Agency (FIA) in numerous raids conducted on the Franchisees'/retailers had seized 2,287 grey SIMs being operated on the licensee network. These instances of action on part of FIA reflects that the licensee has failed to take appropriate action on its own accord and rather it was forced to terminate the franchisee/retailers on recovery of pre-activated SIMs at the franchisee/retailer. The overall stance of the licensee, as submitted in its replies, makes it evident that it has acted in a callous, negligent and irresponsible manner. The licensee has failed to pay heed to the seriousness of the situation and the rectifying actions taken by him are insubstantial, reactive and a mere eyewash.

d. It is pertinent to mention here that although the licensee has introduced some measures to limit the sale of grey SIMs that include maintaining/black-listing data of CNICs and BVS device control through means of geo-fencing and inventory binding, the precise operation of these BVS devices is questionable since they are being operated on a district-wide basis rather than restricted to a city or defined area of operation/shop of a franchisee/retailer. The stance of the licensee regarding responsibility of use of the SIM on the "subscriber" is not agreed because of the fact that "grey SIMs" are often issued without the knowledge / consent of the subscribers fraudulently so his/her responsibility of usage is not applicable.

e. Another important question that begs the indulgence of the Authority is the argument raised by licensee for not being able to exercise proper control over its franchisee/retailers. This notion is based on unfounded and perverse logic. The franchisee/retailers of the licensee are operating under subsisting franchisee agreements and are acting as agents of the licensee. In these circumstances, it is the primary responsibility of the licensee to ensure that its franchisee/retailers are in compliance with the applicable regulatory regime, regulations, SOPs and determinations of the Authority.

4.1.2 Door to Door/Kiosk Activity

With regards to conducting door to door kiosk activities without prior approval of the Authority, the licensee did not address this contravention in his responses to the SCN. In the course of the hearing, it however, submitted that no door to door kiosk activity had been carried out by the licensee. This assertion is incorrect on the premise that the licensee vide the Authority's letter dated 14th February 2020 was duly informed about 10 areas in which door to door kiosk activities were being carried out by the licensee without prior approval of the Authority. These areas had been identified following a sample survey being conducted by the Authority in December 2019. As per available record, there is no approval of door to door kiosk / activities in the area as identified and shared with the licensee.

4.1.3 PTA's Determination dated 7th November, 2016- Minimum Sale Price for a Mobile SIM

In the context of the licensee's selling SIMs below the price of Rs.200 as determined by the Authority, the licensee has admitted that it is practically impossible for him to enforce the Determination at retail level across the country as the market has its own business and commercial dimensions. The licensee further submitted that the Authority is well aware of these limitations on part of the CMO's and has decided to review its determination. The learned counsel for the licensee averred that till the Authority was reviewing the determination, the licensee was under no compulsion for selling its SIMs at the Minimum sale price of Rs.200. This argument on part of the licensee is incorrect and would require a quantum leap of justification for continuously violating the directions of the Authority as has been observed in the case of the licensee. The licensee through its conduct has shown blatant disregard to the PTA's determination for minimum sale price for a mobile SIIM. As per applicable license terms and conditions and enabling regulations, all directives, notifications, standard operating procedures and orders issued by the Authority from time to time are binding and applicable on the licensee.

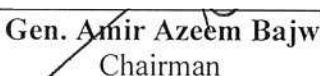
5. Order:

In light of the foregoing discussion and findings, the Authority hereby concludes and decides as under:

- 5.1 The licensee has failed to satisfy the Authority about the contraventions and the same cannot be taken lightly keeping in view the conduct and non-compliance of regulatory laws and directions of the Authority by the licensee as discussed above. Thus, as a result of non-compliance of regulation laws, the licensee is hereby imposed with a fine of Rs. 50,000,000

(Rupees Fifty Million). The licensee is directed to deposit the fine within ten working days from date of receipt of this enforcement order.

- 5.2 The licensee is further directed to submit report to Director Enforcement at PTA's HQs, Islamabad, on monthly basis for sale of SIMs in accordance with applicable regulatory regime on the format as provided by him. Time period for submission of report will commence from the date of receipt of this order. This monthly report will continue till further order(s) of the Authority.


Maj. Gen. Amir Azeem Bajwa (R)
Chairman

Muhammad Naveed
Member (Finance)

Dr. Khawar Siddique Khokhar
Member (Compliance & Enforcement)

Signed on 30th day of July, 2020 and comprises of (11) pages only.