

Before Amir M. Khan Afridi, Director/HOD (Adjudication-I)

In the matter of Show Cause Notice issued to Alfalah GHP investment Management Limited

Dates of Hearing

April 05, 2022

**Order-Redacted Version**

Order dated May 09, 2022 was passed by Director/Head of Department (Adjudication-I) in the matter of Alfalah GHP investment Management Limited. Relevant details are given as hereunder:

<b>Nature</b>	<b>Details</b>
1. Date of Action	Show cause notice dated March 02, 2022.
2. Name of Company	Alfalah GHP Investment Management Limited (the Respondent and/or the Company)
3. Name of Individual*	The proceedings were initiated against the Company.
4. Nature of Offence	Alleged contraventions of <u>regulations 38(2)(b),(g),(s), 38(1)(h)(vii) of the Non-Banking Finance Companies and Notified Entities Regulations, 2008 (the NBFC Regulations) and Circular No. 26 of 2015 (the Circular) read with Section 282J of the Companies Ordinance, 1984 (the Ordinance).</u>
5. Action Taken	Key findings were reported in the following manner:  I have considered the written as well as verbal submissions of the Company and the Representatives respectively, and of the view that justifications provided by them are not cogent as the KYC Forms, AOF and policies/ manuals related to correspondence with investor were incomplete. However, the current KYC Form sample presented by the Company) indicates the effort made by the Company to reduce the lack of communication/ trust with its investors. However, it is the Company's fiduciary duty to get it completely filled by the prospective investors/ customers. In the instance matter it is clearly established that the Respondent was non-compliant with the respective requirements at the time of default. Thus, this state of affairs establishes a violation of the mandatory provisions of NBFC Regulations. Therefore, the Company is liable to be penalized under Section 282 J (l) of the Ordinance.

	In exercise of the powers conferred under Section 282 J (1) of the Ordinance, I, hereby impose a fine of Rs. <u>500,000/- (Rupees Five hundred thousand only)</u> the Company on account of the conceded and established default of the legal provisions. as mentioned in the above para.
6. Penalty Imposed	Rs. 500,000/-
7. Current Status of Order	CTC obtained by the respondents.