



# Securities and Exchange Commission of Pakistan

Adjudication Division  
Adjudication Department-I

Before Ali Azeem Ikram, Executive Director/HOD (Adjudication-I)

In the matter of Show Cause Notice issued to Moonaco Securities (Private)  
Limited

Dates of Hearing

March 22, 2021

### Order-Redacted Version

Order dated March 26, 2021 was passed by Executive Director/Head of Department (Adjudication-I) in the matter of Moonaco Securities (Private) Limited. Relevant details are given as hereunder:

Nature	Details
1. Date of Action	Show cause notice dated February 08, 2021
2. Name of Company	Moonaco Securities (Private) Limited
3. Name of Individual	The proceedings were initiated against the Company i.e. Moonaco Securities (Private) Limited
4. Nature of Offence	In view of alleged violations of Regulations 15(3), 13(7), 4(a) and 18 (c)(iii) of AML Regulations 2018 read with Section 40 A of the SECP Act, 1997
5. Action Taken	<p>Key findings were reported in the following manner:</p> <p>I have examined the written as well as oral submissions of the Respondent and its Authorized Representatives. In this regard, I observe that:</p> <p>i. The Respondent could not provide pre-inspection evidence to exhibits that the Respondent was complying the requirements of Regulations 15(3) &amp; 13(7) of the AML Regulations at the time of inspection in respect of identified instances. It was claimed during the hearing that subsequent to the inspection, the Respondent has removed the identified deficiencies.</p> <p>ii. The Respondent submitted certified true copy of Board resolution dated</p>



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	<p>November 17, 2020, to depict amendments to the its AML and CFT policies, procedures and controls to address identified deficiencies in policy. Therefore, subsequent to the Inspection the Respondent has rectified the default of the said Regulation.</p> <p>iii. The default of Regulation 18(c)(iii) were consequential to the default of Regulation 4(a) of the AML Regulations.</p> <p>In view of the foregoing and admission made by the Representatives, contraventions of the provisions of Regulations 15(3), 13(7), 4(a) and 1 of AML Regulations have been established. Therefore, in terms of powers conferred under section 40A of the Act, a penalty of Rs. 260,000/(Rupees two hundred sixty thousand) is hereby imposed on the Respondent. However, in reference to Regulation 18 (c) (iii) Compliance Officer of Respondent is warned to be careful in future. The Respondent is advised to examine its AML/CFT policy &amp; procedures to ensure that the requirements Regulations are met in letter and spirit.</p> <p>Penalty order dated March 26, 2021 was passed by Executive Director (Adjudication-I).</p>
6. Penalty Imposed	A Penalty of Rs. 260,000/- (Rupees Two Hundred Sixty Thousand) was imposed on the respondent company to ensure compliance of law in future.
7. Current Status of Order	No Appeal has been filed by the respondent company