

Implications of Pakistan's removal from the FATF Grey List

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A very warm welcome from London to all of you for joining, the conversation today, focused on Pakistan's long and drawn-out ordeal with the financial action task force the international watchdog against money laundering and financing of terrorism.

Firstly, I would like to thank and express my gratitude for giving me opportunity and particularly to Lahore Garrison University to basically share my thoughts and experience with the audience and thank you Kaukab Zubari, I 'will cover definitely the legal part.

Finally, Pakistan is out of woods. Putting an end to the rumours and speculations, Financial Action Task Force (FATF) on 21st October excluded Pakistan from the grey list of the global watchdog on terror financing and money laundering after four long years. Pakistan was put on this inglorious list back in 2018 for its failure to check the risk of money laundering, leading to corruption and terror financing. With Pakistan's enlistment on the grey list, it had become increasingly difficult for the country to negotiate financial aid with the IMF, the World Bank, the Asian Development Bank (ADB), and the European Union. Thus, it further compounded problems for the cash-strapped country. Pakistan needed 12 votes out of 39 to exit the grey list and move to the white list. To avoid black list, it needed the support of three key countries. China, Turkey, and Malaysia are their consistent supporters. After being placed on the grey list by the Paris-based global watchdog on money laundering and terrorist financing In June 2018, it was given a plan of action to complete it by October 2019. Since then, the country continued to be on that list due to its failure to comply with the FATF mandates. However, after over four years of rigorous monitoring and effective implementation of the given tasks, Pakistan has been removed from the grey list. The official statement issued by FATF appreciated Pakistan's unflinching resolve to abide by the rules and regulations recommended by the global watchdog. It reads, "The FATF welcomes Pakistan's significant progress in improving its AML/CFT regime. Pakistan has strengthened the effectiveness of its AML/CFT regime and addressed technical deficiencies to meet the commitments of its action plans regarding strategic deficiencies that the FATF identified in June 2018 and June 2021, the latter of which was completed in advance of the deadlines, encompassing 34 action items in total. Pakistan is therefore no longer subject to the FATF's increased monitoring process."

Nonetheless, these glad tidings of being removed from the FATF grey list mean a lot for Pakistan. Having already suffered direct consequences and economic difficulties from its time on the grey list, the removal comes as a breath of fresh air.

I remember when Pakistan was first placed on the list there was a lot of scepticism a lot of doubt some people thought that you know there's a grand conspiracy may be politically motivated perhaps India is behind it some thought it will be transitional some thought it won't be important because we had been on the grey list earlier but slowly with time we realized that or at least the market realized that it is going to be important or it is going to be something which has to be treated seriously and somewhere in that three-year period we saw a real shift in the attitude of the government I think it was not immediate it took some time but then the gears were changed and the government started to treat it more seriously we saw changes in regulation and now after three years of long period it does seem that we are

perhaps close to the end of it to discuss this topic and the implication of Pakistan's removal from the FATF list and how we achieve that.

Before coming to direct impact and indirect impact I would like to highlight one thing that Pakistan going into grey list was a good thing for Pakistan that was the time that I have seen the civilian and military leadership and political all the political parties came together and really you know come up with addressing the issues together one first time otherwise they were not taking serious and I have seen a critical role from central bank regulatory authorities central bank state bank of Pakistan and SECP really they were the forefront and I must appreciate their efforts and how they really you know address the action points and today we can proudly say that Pakistan has really addressed Paul 34 although the team came on-site inspection and then in October that they saw the sustainability of the of the legislation that has been passed and executed so this is important so this kind of a preamble to my subject coming back to direct I think direct impact or indirect it will be difficult but in total perspective when you look at the cross border reference that is the key thing when we say cross border reference for from a for investor perspective from crossword banking perspective from FDI from portfolio investment so I will touch base on certain things coming back to the direct what I have personally realized that we used to do key in a normal way through the normal system but after going to the into the grey list several times so now it was it was a compulsion up to Pakistan to basically put strong systems in order to have the KYC and perhaps monitoring and of course ultimate beneficiary ownership is the key so knowing UH who is behind how the money is moving out so this is one thing the putting up the system and it is it is a costly thing so direct impact is that increase banking systems they have really increased the cost of doing business by that crossword banks they have putting more pressure on the local banks to really do the due diligence whenever they do the payment services so it be from normal transfers or trade transfers Pakistan is a big country for it so I will touch this little bit on the trade days money laundering also that is again crucial part of the overall scheme okay so I must say that in in the scheme of a compliance perspective today go after going through the process, I can clearly say that today Pakistan's banking system and exchange companies' system is much stronger than the regions okay this is I'm telling you because I know the system how it works and I think that's why I was saying that it was good that Pakistan was under grey list so that we have completed our major reforms in terms of the system and payment mechanics this is important to be noted now moving further on the trade because Pakistan trade and remittances two are the major pillar for Pakistan and that's why aml comes under play and we see how the money trusts us we

I have observed in several countries including in Pakistan in the past also that trade-based money laundering is backing up is big issue under invoicing over invoicing putting some money outside and you know it is difficult to catch UH versus against normal transfers of the funds okay so this is extremely important that's why the trade-based money laundering UH globally becoming a big issue from a compliance and banks are extremely cautious so I must say that today Pakistan's banking system in compliance wise are much stronger and central bank the monitoring process particularly the STR'S Suspicious transition reporting mechanism extremely important and effective so this this is part one moving to crossroads banks how the foreign bank JP Morgan City and you name it at one time you know they were doing UH not only in Pakistan and other developing countries and friendly markets very easily but today because of their group compliance and the group policies they are shying away of certain countries where they say that look they are under a grey list okay we are not talking about the black list where the real sanction is only Iran and North Korea so grey is

again a concern recently uae and turkey and I can touch this little bit on turkey because they are their reliance is heavily on the commercial borrowing and other so this is important moving into the imf extremely important to know that Pakistan or other countries who are UH IMF reliant or under imf program recently I must say that IMF included fed up or the considerations or action points and it's monitoring under the programs and they monitor as part of the overall scheme so again for Pakistan today is extremely important for I'm not just today in general also so IMF is a crucial member and of course it's a centre to all multilateral agencies so again it is important for multilateral agency perspective UH to need to follow so I think this this is kind of a direct impression and now that's moving quickly because time is short so I will quickly pass on whenever rating agencies and I'm only emphasizing cross-border okay cross-border rating they don't write I don't see I haven't seen the evidence but the snp movies and other agencies when they rate foreign currency UH country limit or exposures they talk about feta they talk about the majors they talk about the action items they talk about these things so back of the mind whenever they are talking about political aspect economic aspect and operational aspect they take consideration into the fed up thing so I think this is again important from a balance of payment perspective whenever they are, the countries are facing again we are talking Pakistan so Pakistan is a classic case for this moving to the FDI is a longer term play of course so if whenever any foreign companies come into a toe to commit capital and long-term places so of course anti-money laundering AML and of course cfd is the crucial to really see how that the governance structure for a country is viable to have a capital safety as well as human UH safety and their franchise UH safety on that perspective UH ali you must have seen UH portfolio investors yes there are a series of we have seen hedge funds and banks generally are questions whenever they are entering into any country so they really see that the governing factor they come on the ground they discuss with subjects with regulators and you know people were talking today is the extreme importance on that perspective so these are certain aspect which I can say that we have direct impact cost of doing business connect with the foreign banks and lc confirmation pricing the pricing the cross border pricing generally increases UH so if you raise capital from abroad through the capital market access or so it be from the UH letter of credit UH consideration . I must say here that it's not completely economic factors or governance factor I must say that some politics also play into this road that's why the nomination and supporting and you know signing on UH this is UH comes under the foreign affairs UH how we have a relationship with our countries in general who are our friends who are who will support us you know it's not just voting yes or no it is a comprehensive perspective. These are seen the legal side of the changes and the requirements which were needed for dealing with FATF UH how comprehensive were they how difficult was it to make those changes did it really require a very strong political will how did the government get the political will which was required to do all of those changes. you know it was a rare um achievement that you know we saw consensus amongst political parties and all the other institutions that they had to take this seriously and I must say that I don't think it came quickly and then it did take them some time to understand the seriousness but the investment which has gone over the last three years and building up the infrastructure on the compliance side perhaps it will help Pakistan over the long term because it will give us more credibility on the on the system than processes which have been put in place by the financial sector .

There is some politics at play I would say there is a lot of politics just international politics at play when it comes to grey listing of any country if we look at what's happened in the recent round UH in terms of let's say the grey listing of UAE UH it's no coincidence in terms of the timing UH you know of that grey listing as well talking about Pakistan. In the first round of grey listing as well back in the late 2000s and Pakistan did make some

amendments to existing laws at that time there was a similar process that was followed and Pakistan was taken off the great list however one has to say that you know the work done at that time or the work required to be done from Pakistan was nowhere as comprehensive as it was this time around. I would also make it a point to say that you know if we are to just compare the situation in relation to Pakistan whether it's in terms of the legislative framework that exists UH the delegated legislation rules that exist in the country and the banking infrastructure that exists UH I think we fare as a country Pakistan is a country much better than many countries in the south Asia region so perhaps that's a that's something a comparison in that respect is something to be done UH at some point and hence why my point that you know international politics does have a role to play that you know of all the countries in the region Pakistan is UH picked on and then put through such a comprehensive process. It was a difficult process but whatever has been done I think at the end of the day the beneficiary is Pakistan itself as well in the long run so in the short term of course the cost of business has gone up the cost of compliance has gone up so when we talk about the cost of doing business in Pakistan in many respects because of the various legislative and regulatory changes and the enhanced due diligence requirements and enhanced compliance requirements UH mean that there is an additional burden on the regulated entities whether in the banking finance sector in the stock market even on lawyers and auditors so I think that has increased and that cost of course gets passed on in terms of time or money or resources to the end customers eventually that has been done now so I think you know in the long run once we're off the screen list it will act to Pakistan's benefit that Pakistan will be one of the better organized better documented economies in the world not just in the south Asia region how what was required I think I mean it was more than a dozen laws were required to be issued in Pakistan a few dozen regulations and rules were required to be passed by authorities such as the securities exchange commission of Pakistan by entities like the state bank of Pakistan , the Pakistan's financial monitoring unit is housed in addition to the bodies at other organizations it required a civil military partnership to achieve this UH I it was not easy to you know we since 2008 we were in a in a political situation where it was difficult to achieve political consensus on new laws so I think if you take a look at the overall legislative work and delegated legislative work done in Pakistan UH a lot of that would one way or the other relate to fatigue on other things you know Pakistan as the Pakistanis on this UH on this session would know that you know the President can issue temporary ordinances instead of an act of parliament and the ordinance then eventually needs to be converted into an act of parliament UH by a majority vote UH of the members of parliament so in many cases the other legislation were issued initially or in most cases remained so as ordinances but fatigue related laws UH went through parliament were passed there was a UH to minority the inter-ministerial UH committee UH departmental committee comprising of a couple of dozen people senior officials from all relevant authorities so you see you had people from customs income tax securities exchange commission of Pakistan state bank of Pakistan federal investigation agency UH you know special branch of the police the intelligence services and so on state bank of course so you know all because all those organizations got touched in relation to what needed to be done to comply with fetish requirements so it was no joke Pakistan also it's important to highlight Pakistan is not a direct member state of FETISHf Pakistan is a member state of Asia Pacific Group which is a member of fatima but as it works UH you know Pakistan or no other country wants to be you know on an oecd or fat of grey list or god forbid a blacklist so because the global markets just view them as a standards that countries are expected to follow so a lot has been done now the you know of course during this session people perhaps would also like to know how does this impact or benefit Pakistan now that we come off the grey list so I think what we are saying all of us are saying is that the legislative framework and the delegated legislative framework is now there in Pakistan it

is a much more organized documented economy you know if you have to open a company in Pakistan you need to provide beneficial ownership information you need to provide if you open you know stock trading accounts or bank accounts you need to provide more detailed information if you're a foreign entity doing business in Pakistan you know the banks would do due diligence enhanced due diligence to ensure they know who's the ultimate beneficial owner in each case and it's not just Pakistanis coming through cold course and so on so our spv is abroad so all that has been done and Pakistan has been UH . you know has faced a lot of UH terrorism related activities over the last two decades so if any country apart from you know some countries in in the broader middle east north Africa region Pakistan is one country that has really fought back right and pushed back extremist militant elements from the country so you know it is in Pakistan's own interest to do all this we've not done this for anybody else although you know we could have done it without being on the grey list and without suffering the financial consequences but eventually it works to Pakistan's advantage and I think it's a perception game the markets foreign direct investment a lot of this works on how the money managers the investors the ultimate you know decision makers what they perceive about a country or an investment opportunity you know they ask people like you and me as their advisors and you know when they hear about the fed of grail is they were like okay what does this mean you know it just you know create some reluctance so getting off the grey list um I think the first thing it'll do is it'll change the perception it'll improve UH that it'll also change how you know international organizations fund managers investment firms how they interact with Pakistan and Pakistani entities whether they are banks or Pakistani companies or Pakistani traders and what the process will be in terms of on boarding Pakistan related organizations at their end that's going to become easier because Pakistan will no longer be subject to enhanced td as a grey-listed country so there are various international and local aspects that need to be considered and I think which will have a positive impact in relation to Pakistan's investment climate and UH and forecast as a result of coming out of this grey list

It seems to me that there were three main benefits of FATF for Pakistan the first from a stock market perspective our biggest challenge always was that most of the wealth in Pakistan is trapped in undocumented sectors so you know real estate and gold namely so perhaps like with fatf compliance there will be more even application of documentation on those sectors which might make it provide an even playing field form and move money to the documented sector the second is that it kind of forced digital um technology adoption like if I see in the stock trading and wealth management area we all had to implement new technologies in order to deal with the compliance requirement and I suspect similar has happened in the banking sector so just because of the task was so difficult. All people were forced to implement technology UH to deal with that and the third was UH perhaps this is one of the rare equations where we have seen that the bureaucracy and the politicians and the and the army can work together and work together quickly to achieve something so perhaps you know there's a silver lining over there that it's a good precedent to be said that if they can achieve this then perhaps they can also work together on other issues which might be of UH critical and important nature

The key thing it's not just one entity it's all civilian political and leadership army and other all agency custom everyone is at par so they have really increased their governance framework and policies and systems and definitely whenever you know digital is the future now once you have the UH you know payment mechanism digitally the systems driven not just putting 100 people on the compliance no they say we need to have a proper system in place so systems are the key and the digital UH transfers of the funds are the key and of

course still I believe Pakistan there is a room to address UH you know particularly how the money circulation UH in Pakistan so it'd be from real estate or any other means I think this is a high level so I think that will be addressed last point I must say each country although the broader framework for fed up is aml and cfd but each country they have out of 40 action points so for example Pakistan in the last years few years were basically not on the aml side but on the cft side UH it was a challenge for them for example Dubai is not cft turkey is not cfd they have seen some flow from Russia and Ukraine UH conflict and you know coming up so and see UH you know how we can process the UH process the payment services that is the key and you touch base on a very good point that the way and we have to look forward you know digital is the future now once you have the UH you know payment mechanism digitally the systems driven not just putting 100 people on the compliance no they say we need to have a proper systems in place so systems are the key and the digital UH transfers of the funds are the key and of course still

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I do think that that's a perception that's shared by a lot of the decision makers in Pakistan UH you know across the political divide and the civil military divide I think there is no doubt in people's mind that there is international and geopolitical UH influence in this process like you know I would say that how uae and turkey are different although they're on the grey list or the same realist by fetters the emphasis there is different and again it's politics at play I mean nothing has changed in uae or turkey UH in the last year or two UH so that they are suddenly on the grey list right in fact you know uae has emerged as their business hub it's the Hong Kong and Singapore and London of the region so you know money flows through uae now so UH so I think it's something that you know people are watching UH you know with concern as to why this is happening in Pakistan's case I think what's changed actually is the sentencing and imprisonment of one particular individual and sanctioning of one particular UH you know organization with our neighbouring country has been insisting on being blacklisted or UH you know or being tried under Pakistani laws or you know so I feel that that's really down to that UH you know and if that individual UH is released tomorrow UH through Pakistan's appellate court system let's say in six months' time I wouldn't be surprised to see if the pressure is back on Pakistan . um you know in in the process of course you know there has been a proper follow-up of course UH in relation to the action plan you know in each of the steps that Pakistan was to comply with but I feel that if Pakistan had not complied with half of them as comprehensively as Pakistan has done today and has left no excuses really but had instead convicted and imprisoned UH you know that UH that person and you know and sanctioned that organization Pakistan could have gotten off the grey list earlier so you know and I would challenge people to counter that argument right so it is what it is you know the international dimensions were and so on um and this time it's just been much more difficult for Pakistan to get off the grey list and I think credit

goes to everybody involved in that process all the legislative efforts that have been done and I just hope that Pakistan keeps that momentum for its own sake UH curbs you know any open avenues of terrorist financing in the country for the country's sake and convicts people who are involved in any way or form in such activities no yeah as a financier um at the capitalists it really scares me the use of finance is a politic a tool of politics but we have seen that in Russia now for example and I'm worried that it might lead to the more localization um over the long term.

There any risk to backsliding in terms of the reforms so that the October review does not lead to the removal of Pakistan from the grey list I mean if I don't think we are going back we are if anything we are moving forward UH but the geopolitical politics element is there right so that's the main thing I would say but in terms of what Pakistan has done and UH implemented that day to stay now I feel I don't think it's a political choice I think all political parties UH are on board on that UH you know and clearly with the support of the military establishment yeah, I can also add I don't see going back why because the stake is very high banks have already established system it's not just authorities it is on us on us also to really monitor and do the compliance it's not just you know because we eventually we are dealing with the cross one banks so it is bonus on us from whenever it comes to aml when it's come to cfp of course the other agencies to play and I think the good part after the whole process you know is awareness with all political parties all authority agencies and everyone is at power this is the key thing so I and then I'm happy that we remain in grey for long because it took long way to it's not easy you can't just change your legislation or systems or mind-set at bar overnight it took you know, longer period so I must say that today again because I have I've seen so many other countries where the systems are not strong and but our system today and again UH you know I must appreciate because I have really seen how the FMU financial monitoring unit they manage STRZ and SECP and others so you know and of course other customs and other so everyone are upgraded their system the mind-set is there so I think let's hope and we should come out and never come back until unless something UH you know happens. I must say that in Pakistan the biggest revolution which I have seen is the CNIC you know the similar to social insurance number in U,S and Canada and CNIC is one so everything is going into linking so banks UH whenever they do KYC whenever the opening account so it's all about linked with the and it will take a little bit more time and I 'm very optimistic that the whole system the ecosystem will evolve in a way that you can't say that is a parallel or official so eventually it will come and again I must stress that that institution should fast track bases I have the id and digital system in place and I was for example I was Kenya I have seen m MPESA and how they have moved away from the notions nodes in circulation so I think unfortunately in Pakistan today beside other challenges I would say it's not a subject for today but notes in circulation that should come into the system okay, so I think that will come whenever we have we have system and process and tracking number is aligned which is CNI's please go ahead if I can add to this I think because of the international audience that we have today in the session people may not realize because then people think of Pakistan you know it's just a perception issue that we have in terms of the country but people may not realize that you know it's been a decade or two in the making that Pakistan introduced you know sort of electronic UM national ID cards and you know many five to ten years were given for people to renew and replace those with chip-based CNICs which were then linked to everything else and then due to again our own internal fight against terrorism and compliance issues you could not get a mobile phone sim unless you had verified it with your thumb impressions and your fingerprints which were all linked to your id card as well that's all happened across Pakistan now you know you can't land at the airport and just show your passport or something and just get a sim you know a temporary sim you need to UH it's

all connected and then when the because of digital financial inclusion when the telecom companies started offering digital wallets or you know transfers of funds it's also all linked to their either mobile numbers and their CNICs so a lot of documentation has taken place and all of this can be tracked right so UH so I think we are way more advanced than the world thinks you know in terms of UH connectivity in terms of UH you know compliance and related issues you know absolutely and I'll add on this that from at least from a stock market perspective um it has actually improved made it easier for financial inclusion you know when someone launched K-trade in 2017 back then you didn't have digital on boarding so you had to fill paper form your required signature 40 signatures on that form now what used to happen was that it made very it made actually it made it very difficult for people to comply with regulation because the clients do to say hey why are you asking for all this information the other smaller broker is actually not asking me for all of this so why are you asking me for added information because at that time there was not proper implementation of the KYC requirements now because of the FATF requirement because everything is UM strictly enforced and it is all digital so it has a become easier but it's a level playing field everybody has to comply with the same things so you know there's no excuse which people have so. I think ironically it has actually helped in NAB fling financial inclusion. When implementing the laws for CFT as a country we have seen across this political spectrum that laws have been made but the problem is always there when it comes to implementation for example such as the case with the Hawala Hundi UH thing so will there be implementation of CFT. Remittances is the key portion for Pakistan and in last two years the Covid really played a you know greater role in terms of moving away from Hundi and Hawala actually okay, not only just for Pakistan I have seen in Philippine and Bangladesh and India and other countries these are the major you know so

I think in last two years during the Covid I think UH banks have really upgraded their systems so that most of the remittances are coming UH from abroad into Pakistan UH more digitally another point and digital central bank again I must say that the digital account was initially launched for overseas Pakistanis but that's the same framework linked to the RAST and other payment mechanisms giving a linkage from the banks to the stock market and real estate and the other they are the framework is evolving digitally so it will it start has already been done now it will go away in a way that people will come again and again and do the payment mechanism smoothly . I must say that this money transfers both ways have become really monitored from the banking channels yeah, I would also add that look it's become very difficult to do any substantial transaction in Pakistan through cash now right so for most things if you want to buy a car you know you need to have your national tax filer numbers you need to provide your national ID card copies I mean everything is linked now in a way right so the cash economy is getting will get smaller UH you know especially as the digital economy grows and I think we are on track the building blocks are there now things are connected two main things I mean your id card your bank accounts and finally your telephone numbers if everything is already linked you know and your with your fingerprints and UH and your data you know there's not much else left in order for you to be able to function digitally across all spectrums of your daily life so that's happening I think implementation of law is a problem everywhere UH you know a you know our neighbouring country India has a you know similar anti-terrorism laws and all that and very low conviction rate UH in relation to that so Pakistan is not alone when it comes to that and but in this case I would say many of the fatigue related UH laws , you know we have already seen implementation so I know that securities exchange commission of Pakistan has fined UH organizations which are regulated by it or even their directors UH if UH you know updated you know information on it on their customers has not been obtained by those organizations

within the relevant time period so the regulators are taking things seriously and hence as Ali Sultan said you know it's already moved from the from the UH from the parliament to the regulators to the actual organization the banks the stock brokers the law firms audit firms and so on and real estate agents um it's a process it's taken us some time to get here but I think we are getting there and we're getting there in our own . now this is already at the implementation stage with the private company so that's why reversing that is not possible and I would even add that I think that triangulation of id card and telephone number and um and the usage with the bank account that has really helped Pakistani fintech industry. I would actually think that implementation of red tech and the forced implementation of you know combination of these kind of systems will help Pakistan.

I know how this recent NAB reform will affect the removal of Pakistan from the grey list any comments on that I think they're more relevant for you yeah so I think for those who are not familiar with what NAB is the national accountability bureau in Pakistan created by you know a previous government in order to clamp down on mainly public office holders UH politicians and bureaucrats in terms of assets beyond means mean UH you know that's been used by successive governments as a political tool and there's been talk about amending certain parts of it I don't agree with the many of the amendments that have been proposed in the recent amendments UH now and my understanding is that it's been challenged before the supreme court of Pakistan and in fact the supreme court has admitted the case against these amendments for hearing so that remains to be seen anyway if these amendments will become effective or if most of these will become effective so um so in it so it's too early to comment on that I think the fact of the scene would take place before we really know the impact or the outcome of these NAB amendments but it's not too directly linked UH with the grey listing issue

I can just say that from the audience perspective it is important to really see a country and understand the UH you know fatal perspective and it is always good to improve the governance and the governance the compliance is the biggest subject and biggest business today UH in the banking industry and rightly so UH so I think UH digital moving into the digital side is a key Pakistan success story is you rightly said the TELCOS and moving into the digital side so I think there is a big room to move because UH is still lacking . UH is moving people into the banking system still we have there is a gap so that gap needs to be filled and you know the biggest challenge is how you know the UH even in the Stock Market there's a number of there are limited players are there so I think UH country is moving UH towards digital platforms digital AUTOMA. you know UH the whole system is moving into digital so that will help aml and of course controlling money and particularly eventually to CFP that is the biggest issue and of course UH you know the civilian and military and other political leadership at par that is the key thing I think I must say today's main crux is this previously I have not seen in last five years 10 years for 20 years. today I have a great confidence which is the key thing and but otherwise we have seen so many countries they are there the governance system is weak and of course but of course the political UH play is there so unfortunately we need to improve our foreign relationship okay foreign ministry should play a role in order to really discuss UH these improvements and of course openly discuss the gaps also and see how UH you know multi-lateral they are they are important ADB IFC EORLD BANK everyone is there so onus is on them also by the way to really when they are writing a program when they are putting money so onus is on them also to really UH backtrack these things as imf is doing today. I think this is good for us and similar countries. hopefully Pakistan will be able to import its knowledge of red tech now after this hard work. It took Pakistan issued its first comprehensive national security policy UH through a civil

military partnership last year earlier this year and you know that the focus of that is economic security so it's not a surprise that Pakistan's been able to pull through all this fat of related legislation and everything else around it I think there is a consensus now that for a security state like Pakistan if you call it, that it's not any more about physical or territorial security it's about economic security and things like these are crucial UH you know in that respect so I see that you know Pakistan is moving forward in all respects it's a country of 220 million people it's one of the largest remaining markets in in in the world for expansion for digital players for international organizations international brands and so on so UH I think we just have a perception issue that needs to improve UH and change and UH and otherwise Pakistan is well poised for growth as an economy as and as a country. Pakistan has shown willingness to be a part of the global financial system and shown that there's no holy cows in terms of you know which stop us from you know meeting that commitment to be at least a part of the system and I suppose you know one thing which take away is that perhaps fair implementation of this rules globally across other countries would be something which would help Pakistan and any exception whether it's India or any other country on any kind of financial UH rules UH would be bad for the perception of such thank you everyone.

ⁱ Zafar Iqbal Kalanauri, Advocate Supreme Court of Pakistan, Arbitrator, Mediator U.S.A & U.K, White Collar Crime Investigator, Zafar Kalanauri & Associates, 128-A Upper Mall Scheme, Lahore 54000, Pakistan.Cell: (+92) 300-4511823 & 314-4224411, E-mail: kalanauri@gmail.com <http://www.zklawassociate.com>