



GOVERNMENT OF PAKISTAN
MINISTRY OF INFORMATION TECHNOLOGY AND TELECOMMUNICATION



No.1-2025-LEGAL PVARA

Islamabad, the 09th December , 2025

OFFICE MEMORANDUM

SUBJECT: CIRCULATION OF PVARA ANTI-MONEY LAUNDERING REGISTRATION REGULATIONS 2025 FOR BOARD REVIEW AND APPROVAL

The undersigned is directed to refer to PVARA's O.M. No. PVARA/BOARD/01/2025 dated 1st December 2025 on the subject cited above.

2. It is stated that the comments of this Ministry are as follows:

- i. The Regulations apply the same strict standards to all applicants, regardless of size or risk level. This may make compliance difficult for smaller businesses. A tiered or risk-based approach would make the framework more practical.
- ii. Regulation 18 requires reporting of "material changes," but the regulations do not define what is material versus minor. Without thresholds or examples, applicants may over-report or under-report changes. Providing clear criteria would improve consistency.

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Copy for information to:-

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