

GOVERNMENT OF PAKISTAN
FIINANCIAL MONITORING UNIT
NOTIFICATION

Karachi, the 06th November, 2025

S.R.O. /2025. - In exercise of the powers conferred by section 44 of the Anti-Money Laundering Act, 2010 (VII of 2010) read with clause (h) of sub-section (4) of section 6 thereof, the Financial Monitoring Unit, in consultation with the AML / CFT regulatory authorities and with the approval of National Executive Committee, is pleased to make the following regulations, namely:-

1. **Short title and commencement.**- (1) These regulations shall be called the Suspicious Transaction and Currency Transaction Reporting Regulations, 2025.

(2) They shall come into force at once.

2. **Definitions.**- (1) In these regulations, unless there is anything repugnant in the subject or context:-

(a) "Act" means the Anti-Money Laundering Act, 2010 (Act No. VII of 2010);

(b) "goAML" means the software application used by FMU for data collection, analysis and exchange of information under the Act;

(c) "Sanction Rules" means the AML / CFT Sanction Rules, 2020;

(d) "statutory body" means a commission, unit, department, organization or any other authority that is formed under or by any law for the time being in force; and

(e) "utility entities" means licensed electric and gas distribution companies and telecommunication service companies, cantonment boards, water and sewerage boards and municipal corporations.

(2) All other words and expressions used but not defined herein shall have the same meanings as are assigned thereto in the Act.

3. **Obligation to report suspicious transactions.**- All reporting entities shall file suspicious transaction report as required under section 7 of the Act when conducting an activity or a transaction which is subject to obligations under the Act or rules and regulations made thereunder.

4. **Reporting of suspicious transactions.** - (1) Every reporting entity shall examine the available facts, including but not limited to the background information and possible purpose of the transaction to determine whether a transaction or attempted transaction is suspicious as set out in sub- section (1) of section 7 of the Act.

(2) Once a suspicion is formed pursuant to sub-regulation (1), the reporting entity shall file the STR promptly to the FMU on goAML or in the form and manner as required by FMU from time to time.

(3) Reporting entities shall have risk-based policies, processes and procedures in place to promptly identify and detect suspicious transactions including but not limited to alerts, red flags and indicators.

(4) Pursuant to sub-section (2) of Section 7 of the Act, any government agency, autonomous body, oversight body for SRB, AML / CFT regulatory authority, or foreign equivalent may share its intelligence or report their suspicion to FMU on goAML or in the form and manner as required by FMU from time to time.

5. **Freezing of property.** - Where a reporting entity knows, suspects or has reason(s) to suspect that any property or account is involved in money laundering and needs immediate attention or action on the part of FMU as to the freezing of such property or account, the concerned reporting entity may immediately inform in writing the Director General in respect of such property or account along with the grounds that warrant immediate action and the Director General may make order in terms of sub-section (6) of Section 6 of the Act.

6. **Obligation to report currency transactions.**- All reporting entities shall file a CTR in the circumstances prescribed under regulation 7, except where the exemption has been granted under regulation 8.

7. **Currency transactions.** - (1) When a reporting entity engages in a cash transaction of an amount equal to or exceeding the specified threshold as defined by the National Executive Committee, the reporting entity shall file a report of such transaction to FMU on goAML or in the form and manner as required by FMU immediately but not later than seven working days after the respective currency transaction was undertaken.

(2) Cash transactions between financial institutions regulated by common AML / CFT regulatory authority and the following categories of entities, are exempted from the reporting requirements of sub-regulation (1) above:-

- (a) a department or agency of the Federal Government or a Provincial Government; or
- (b) a Local Government; or
- (c) a statutory body; or
- (d) Payment of utility bills issued to consumers by utility entities

8. Discretionary exemptions from reporting requirements of CTR. - (1)

The Director General with the approval of National Executive Committee and in consultation with respective AML / CFT regulatory authority may, subject to the provision of the Act, exempt a reporting entity for a specified period of time from the reporting requirements of sub-regulation (1) of regulation 7 with respect to transactions between the reporting entity and a qualified business customer of the reporting entity on the basis of information submitted to him by the reporting entity in accordance with procedures which the Director General may require.

Explanation.- For the purposes of this regulation, the expression "qualified business customer" means a customer which.-

- (a) maintains a business relationship with the reporting entity;
- (b) frequently engages in transactions with the reporting entity which are subject to the reporting requirements of sub-regulation (1) of regulation 7;
- (c) is of proven low risk concerning money laundering and / or terrorist financing as determined by the reporting entity; and
- (d) meets any other criteria which the Director General determines is sufficient.

(2) The reporting entity shall, at least thirty days prior to the expiry of the specified period of exemption, review the qualified business customers with respect to whom an exemption has been granted and, upon the completion of such review, resubmit the request for exemption, if so required, to the Director General.

(3) The reporting entity shall promptly inform FMU, upon identification of false or incomplete or fraudulent information, if any, submitted with respect to the transaction or the customer engaging in the transaction or when it has reason to believe that the qualified business customer no longer meets the criteria for such an exemption granted.

(4) Any reporting entity which does not comply with the requirement of this regulation shall be subjected to proceeding under the Act and any other applicable law.

(5) FMU shall maintain a list of all the entities whose cash transactions with a reporting entity have been given exemption under this regulation.

(6) The Director General FMU may revoke the exemption at any time, upon identifying any adverse information received against reporting entity which sought exemption or against the customer. Revocation of the exemption shall be communicated by the FMU to the concerned reporting entity and its respective AML / CFT regulatory authority in writing.

9. Guidelines for reporting STRs / CTRs.- Subject to enabling provisions of the Act, the FMU shall issue necessary guidelines, instructions or circulars governing the form and manner in which STRs and CTRs shall be reported and any other information it sees fit with regards to compliance with section 7 of the Act.

10. Disclosure and provision-of information. - (1) Reporting entities shall promptly provide all documentation supporting the filing of an STR / CTR or any other information as required by the FMU, related to STR or CTR.

(2) The reporting entities, their directors, officers, employees and agents shall not disclose, directly or indirectly, to any person that the transaction is being or has been reported unless permitted under section 34 of the Act.

(3) When providing assistance to the authorities as required under section 25 of the Act, reporting entities and its officers shall keep such assistance confidential and shall not disclose it directly or indirectly to any person.

11. Repeal and Saving.- (1) The Anti-Money Laundering Regulations, 2015, hereinafter referred to as repealed regulations, are hereby repealed.

(2) Notwithstanding the repeal under sub-regulation (1), nothing contained herein shall affect the previous operation of the repealed regulations or anything duly done or suffered thereunder, or affect any right, privilege, obligation or liability acquired, accrued or incurred under the repealed regulations, or affect any penalty, forfeiture or punishment incurred in respect of any offence committed against the repealed regulations, or affect any investigation, legal proceeding or remedy in respect of any such right, privilege, obligation, liability, penalty, forfeiture or punishment as aforesaid.

12. **Sanctions:** - Any violation of these regulations shall be subject to sanctions in accordance with the provisions of the Act and the rules and regulations made thereunder including clause (h) of sub-section (2) of section 6A of the Act.
