



BANKING MOHTASIB PAKISTAN

2024



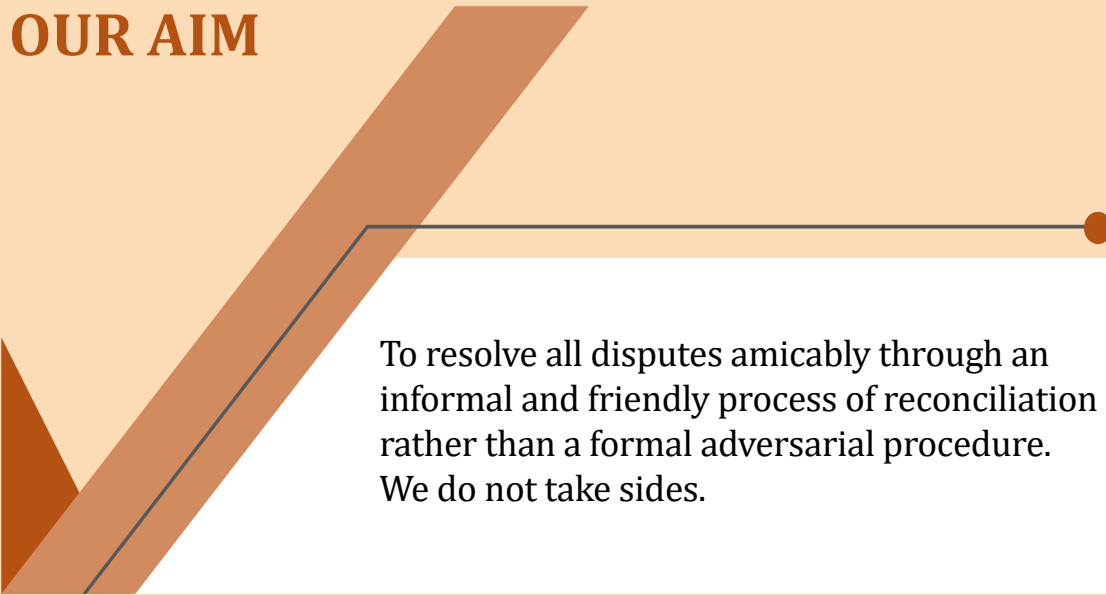
ANNUAL  
REPORT





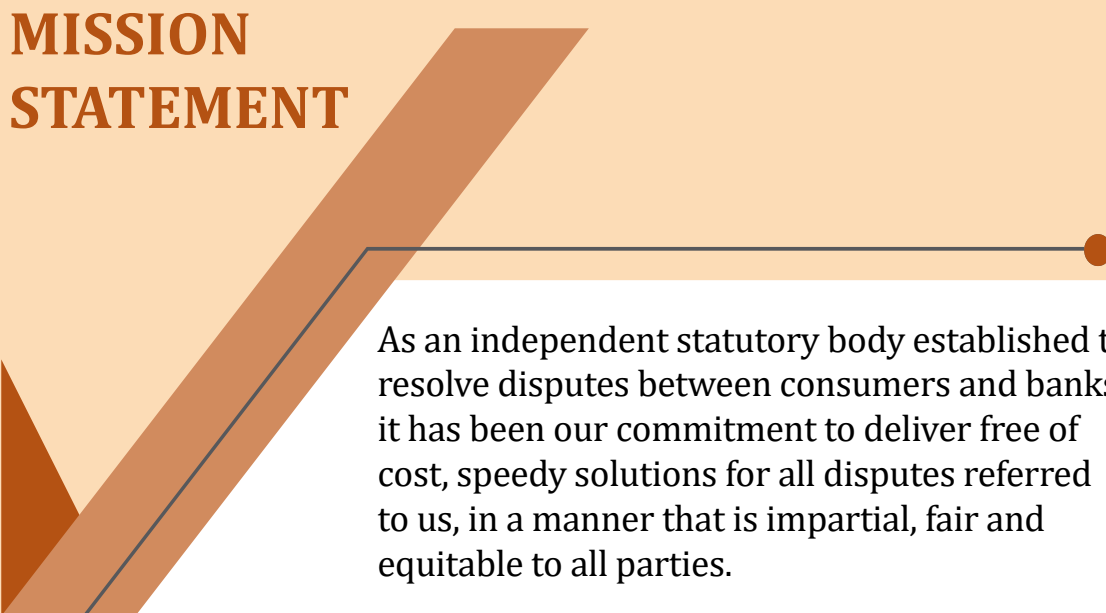


## OUR AIM



To resolve all disputes amicably through an informal and friendly process of reconciliation rather than a formal adversarial procedure. We do not take sides.

## MISSION STATEMENT



As an independent statutory body established to resolve disputes between consumers and banks, it has been our commitment to deliver free of cost, speedy solutions for all disputes referred to us, in a manner that is impartial, fair and equitable to all parties.



# CORE VALUES

We function as a closely-knit team and take collective responsibility for individual decision-making. We have full ownership of our Core Values and firmly believe that by abiding these values, both in our professional and personal lives, we can make a difference.

## ***Responsive***

We receive a large number of complaints daily. We use a practical and rational approach to find fair and amicable outcomes in a manner that is informal and speedy.

## ***Compassionate***

Disputes, howsoever petty, cause unnecessary pain and stress. We analyze each dispute with an open mind and if necessary listen to parties concerned, patiently and sympathetically, so as to find a practical and equitable solution.

## ***Flexible***

We believe that most disputes can be resolved in a friendly and amicable manner. We do not allow rigidity to dictate the dispute resolution process. Instead, we endeavor to create an environment where all concerned are encouraged to be reasonable and conciliatory.

## ***Trustworthy***

We treat all those we meet with respect, courtesy and compassion because only by doing so we gain their confidence and trust.

## ***Transparent***

We are neither consumer champions nor advocates. Neutrality and openness underpin our deliberations. Our service is free of charge. We respect confidentiality in all disputes and institute a process of conciliation that is acceptable to both parties. Decisions taken by us are consistent, clear and balanced so that any rational mind can appreciate the reasoning behind our findings.

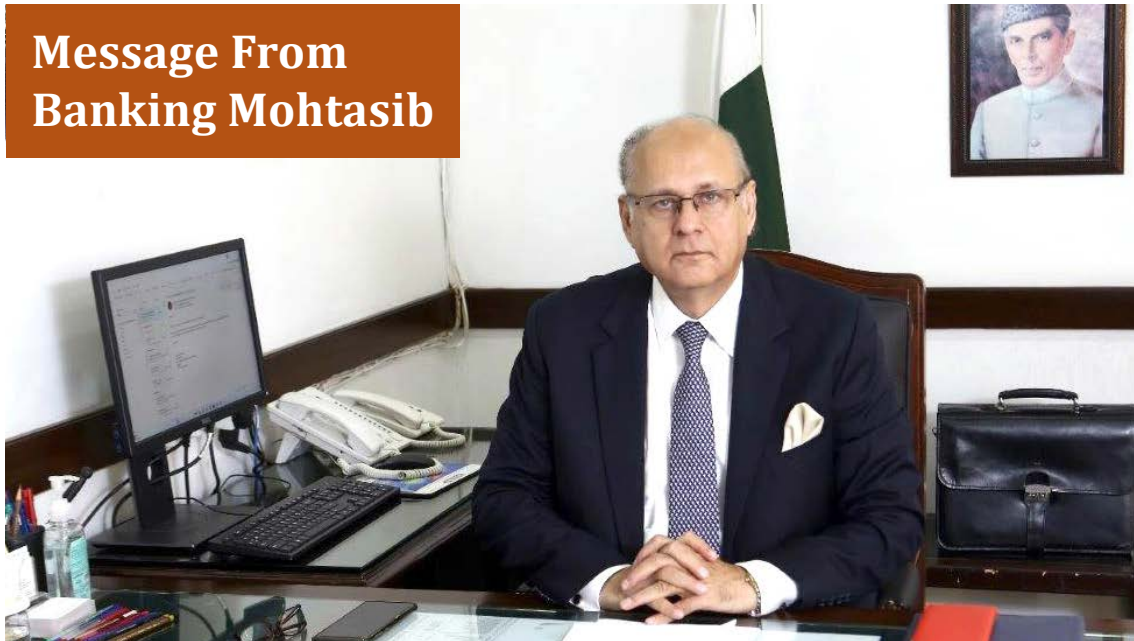


# CONTENTS

<u>Message From Banking Mohtasib</u>	<u>1</u>
<u>Institutional Legal Framework</u>	<u>5</u>
<u>President appreciates the role of Banking Mohtasib Pakistan</u>	<u>11</u>
<u>Receipt and Disposal of Complaints in 2024</u>	<u>13</u>
<u>Overview of Last Three Years Performance</u>	<u>19</u>
<u>Glimpses of Banking Mohtasib Pakistan Annual Conference 2024</u> <u>"Focus on Values in Public Sector Services" "عوامی خدمت کی اعلیٰ امداد"</u>	<u>25</u>
<u>Activities</u>	<u>37</u>
<u>Human Resource Development Efforts</u>	<u>53</u>
<u>Miscellaneous News Items</u>	<u>61</u>
<u>Case Studies</u>	<u>67</u>
<u>Public Acknowledgement of Our Services</u>	<u>79</u>
<u>Print Media on the Activities of Banking Mohtasib Office</u>	<u>91</u>



## Message From Banking Mohtasib



From the root Arabic word, 'hisbah' is the derivative of 'Mohtasib' which in simple English connotes, 'accountability'. In keeping with this basic premise, the fundamental operating principle of the Banking Mohtasib Office is adaptation of an impartial attitude while simultaneously seeking to improve and enhance the capacity building, alongside upgradation of service quality.

In defining service quality, the measure is not restricted to resolution of complaints, but it co-extends the role of the Mohtasib Office in inviting attention towards creation of improved 'internal controls' and 'good governance' inclusive of adoption of 'best internationally accepted practices.'

I am extremely pleased by the degree of confidence reposed by the consumers of banking services in the institution of the Banking Mohtasib Pakistan. Such confidence stands vindicated by the growth witnessed in the number of complaints received and settled in the year 2024. The institution of Banking Mohtasib takes immense satisfaction from having resolved numerous issues, particularly those concerning illiterate individuals of meagre means, who had placed their trust and life savings in the banking system.

The relief provided to the complainants is a serving testimony and endorsement to the confidence reposed by the public at large in the desirability of the need to have available to them a redressal mechanism with no legal costs. The remedy provided to the complainants in 2024 within the shortest possible time as reflected in the report gives us an opportunity to further build our competence and professional skill in resolving disputes in all areas of banking services, including frauds and maladministration relating to deposits, lockers, ATMs, third party products, frauds, cybercrime and fair debt practices. I am certain that in the ensuing years too, banks and their customers shall continue to benefit from the institution of Banking Mohtasib Pakistan as

we continue to partner with them towards enhancement in the standard of quality of customer services. We will continue to impress upon the banks that complaints should be viewed positively from customers because these allow banks to plug any service or systems gaps and by doing so they gain to achieve competitive advantage within the industry.

This new concept asks for innovation relating to capacity building for meeting new challenges of modern-day technological developments, particularly of Digital Banking. The advent and growth of 'Digital Banking' in the local financial landscape brings with it a formidable set of new challenges; this requires continuous updation of the human capital, both at banks and at the Mohtasib Office. Consequently, there has been focused attention to create an environment of 'learning culture' at Banking Mohtasib Office. To effectively and speedily attend to public complaints, staff members were nominated to attend different training courses, while Senior Advisors and colleagues were encouraged to make presentations on a variety of related subjects for over-all development of technical expertise and proficiency. Such presentations played an important and effective role in further grooming of Officers/Staff of the Banking Mohtasib. These presentations will continue to be held in the year 2025 and onwards for capacity building of our Officers/ Staff.

While holding the Office since July, 2023, I have remained cognizant of the responsibility to remain accountable for settlement of disputes between banking institutions and various segments of society due to fraudulent activity, malpractice and mal-administration, etc.

During the year 2024, there was a massive surge of complaints due to increasing use of digital and electronic platform of banking services. The growth in Mobile and Digital applications has also led to increase in the number of frauds as fraudsters are taking advantage of loopholes, laxity and weakness in internal control of banks depriving thousands of people of their rightful savings/ money.

The recently created 'Digital Banks' are now also within the ambit of Banking Mohtasib Office, which increases the need to have more staff that is fully equipped with Fintech operations and related technologies.

The Banking Mohtasib Office receives complaints directly from customers via mail, email, and walk-in at both our Secretariat and Regional Offices. Additionally, complaints are forwarded to us through the Prime Minister's Portal, the State Bank of Pakistan, and the Wafaqi Mohtasib Pakistan. Since the launch of the Banking Mohtasib Portal in 2023, the volume of complaints has increased considerably. It's worth noting that in addition to the Secretariat in Karachi, the Banking Mohtasib has Regional Offices in seven cities across the country, including Azad Jammu and Kashmir (AJK).

In cases where complainants need to be heard in person, hearings are arranged at our Regional Offices. Our goal is to deliver justice at the complainants' doorsteps, alleviating the financial burden of traveling to larger cities.

During the year 2024, we held a record number of hearings at various stations, totaling 1530 against hearings of 760 in 2023. The relief provided during the calendar year 2024 amounted to Rs 1,646.1 million as against Rs 1,268.4 million in the year 2023.

The services of Banking Mohtasib institution over the years have been appreciated at the highest levels and recently the President of Islamic Republic of Pakistan while lauding efforts of Banking Mohtasib remarked as under:

*“The President also emphasized the crucial role played by the Banking Mohtasib in safeguarding citizens against the maladministration of commercial banks and financial fraud. He said that the Banking Mohtasib was a vital institution for the swift resolution of complaints, offering victims timely justice without the burdens of prolonged legal procedures.*

*The President has also encouraged the public to utilize the services of the Banking Mohtasib to address banking disputes and fraudulent activities”.*

Furthermore, the President of the Islamic Republic of Pakistan, as the appellate authority for the orders/decisions of the Banking Mohtasib, has, at times, graciously provided guidance for the sympathetic consideration of complainants' grievances.

We are grateful to the State Bank of Pakistan, which, since the inception of the Banking Mohtasib Pakistan Office, has been providing invaluable cooperation and support. This includes housing our Regional Offices within its premises at all centres as well as offering technical assistance and training to our staff. I would also like to extend my thanks to the officials of the Ministry of Law and Justice and the Ministry of Finance for their continued support and essential assistance to the institution of the Banking Mohtasib.

Besides the statistical details of the complaints received and resolved, a few case studies have been included in the report as they have proven valuable for training new entrants in the banking industry and for disseminating knowledge to all its readers.

In matters of financial arrangements, the element of confidentiality is more pronounced than in any other aspect of social life. In line with this principle, utmost care, caution, and prudence have been exercised to maintain the privacy of the banker-customer relationship.

It is, therefore, with humility, pleasure and honour that I present the Banking Mohtasib Pakistan's Annual Report 2024.

**Sirajuddin Aziz**

Banking Mohtasib Pakistan



# **Institutional Legal Framework**



## Institutional Legal Framework

- i. The institution of Banking Mohtasib Pakistan (BMP) was established in the year 2005 under Part IV-A of Banking Companies Ordinance, 1962 (“BCO”). Subsequently, an Act of Parliament called The Federal Ombudsmen Institutional Reforms Act, 2013 (Act XIV of 2013) was promulgated in March 2013, the provisions of which have effect notwithstanding anything contained in any other law for the time being in force. It repeals by implication whatever is inconsistent with it in the other enactments and confers upon Ombudsman additional power of review.
- ii. The institution of Banking Mohtasib helps in settlement of disputes and facilitates an amicable resolution/settlement between complainants and commercial banks, including the disputes between the banks – fairly, reasonably, amicably informally and in accordance with the Law.
- iii. The governing laws under which the institution of Banking Mohtasib is functioning require that the Institution of Ombudsman must be independent, impartial and autonomous, both administratively and financially, in the execution of its functions relating to adjudication of complaints. Banking Mohtasib’s services are free/ bear minimal cost to the complainants/ parties in disputes.

## Jurisdiction

The role of institution of Banking Mohtasib in the financial industry is to resolve disputes through a process, which is largely conciliatory, and where such mediation is unsuccessful, to adjudicate and pass a speaking order to decide the dispute.

- i. In relation to all commercial banks operating in Pakistan, the Banking Mohtasib has been empowered to entertain complaints of the following nature:
  - a) Failure to act in accordance with banking laws and regulations, including policy directives or guidelines issued by the State Bank of Pakistan from time to time.
  - b) Delays or fraud in relation to the payment or collection of cheques, drafts, other banking instruments or transfer of funds.
  - c) Fraudulent or unauthorized withdrawals or debit entries in accounts.
  - d) Complaints from exporters or importers relating to banking services and obligations, including letters of credit.
  - e) Complaints from holders of foreign currency accounts whether maintained by residents or non-residents.
  - f) Complaints relating to remittances to or from abroad.

- g) Complaints pertaining to markup or interest rates on the ground of a violation of an agreement or directives of State Bank of Pakistan.
  - h) Complaints relating to payment of utility bills.
- ii. In relation to banks in the public sector, the institution of Banking Mohtasib is authorized to entertain complaints against such banks on the following additional grounds as well:
- a) Corruption or mala fide practices by the officers of banks.
  - b) Gross dereliction of duty in dealing with customers.
  - c) Inordinate delays in taking decisions.
- iii. However, the institution of Banking Mohtasib cannot accept complaints relating to banks' policy matters. For example, the following matters lie outside the jurisdiction of the Banking Mohtasib:
- a) Matters relating to grant of loans, advances or finances to customers.
  - b) Complaints against banks' loan and mark-up policies, risk policies, or product and service pricing as included in their schedule of charges and/or any other policy matter.
  - c) Grievances of banks' employee or ex-employee pertaining to terms and conditions of their service also fall outside the jurisdiction of the Banking Mohtasib.

## Empowerment of the Institution of Banking Mohtasib

Act XIV of 2013 enhanced the effectiveness of all Federal Ombudsmen with focus on providing speedy and inexpensive relief and to promote good governance. The following standardized institutional reforms provide additional powers to the Office of the Banking Mohtasib:

### i. Financial and Administrative Autonomy

In terms of Section 17 of the Act, the Banking Mohtasib is the Chief Executive and Principal Accounting Officer of the Office enjoying complete administrative and financial autonomy, and the expenditure of the Mohtasib's Office is charged to the "Federal Consolidated Fund" within the allocated budget.

### ii. Standardization of Ombudsmen Institutions

Act XIV of 2013 has an overriding effect on the laws presently in force and operates to standardize the working of all Federal Ombudsmen institutions in Pakistan.

### iii. Compatibility with International Ombudsmen Institutions

The standardization and harmonization of institution of Banking Mohtasib Office, its independence, mandate and power, as well as the requirements regarding the appointment and removal of the Mohtasib and its funding meet the general criteria set out for membership of international ombudsman associations like the International Ombudsman Institute. This facilitates cooperation, information exchange, sharing of experience, and adoption of international best practices among different Ombudsman institutions.

### iv. Review and Representation

The Mohtasib has the power to Review under Section 13 of Act XIV of 2013, as given below:

- a) The Ombudsman shall have the power to review any findings, recommendations, order, or decision on a review petition made by an aggrieved party within thirty days of the findings, recommendations, order, or decision.
- b) The Ombudsman shall decide the review petition within forty five days.
- c) In review, the Ombudsman may alter, modify, amend, or recall the recommendation, order or decision.

Section 14 of Act XIV of 2013 provides for a Representation to be made to the President of Islamic Republic of Pakistan in the following terms:

- a) Any person or party aggrieved by a decision, order, findings, or recommendations of an Ombudsman may file representation to the President within thirty days of the decision, order, findings, or recommendations.
- b) The operation of the impugned order, decision, findings, or recommendation shall remain suspended for a period of sixty days, if the representation is made as per sub-Section (1).
- c) The representation shall be addressed directly to the President and not through any Ministry, Division or Department.
- d) The representation shall be processed in the Office of the President by a person who had been or is qualified to be a judge of the Supreme Court or has been a Wafaqi Mohtasib or Federal Tax Ombudsman.

### v. Confidentiality

The principle of banking secrecy is strictly followed by the institution of Banking Mohtasib. Therefore, the statements made and the documents produced by the parties in the course of adjudication, remain strictly confidential.



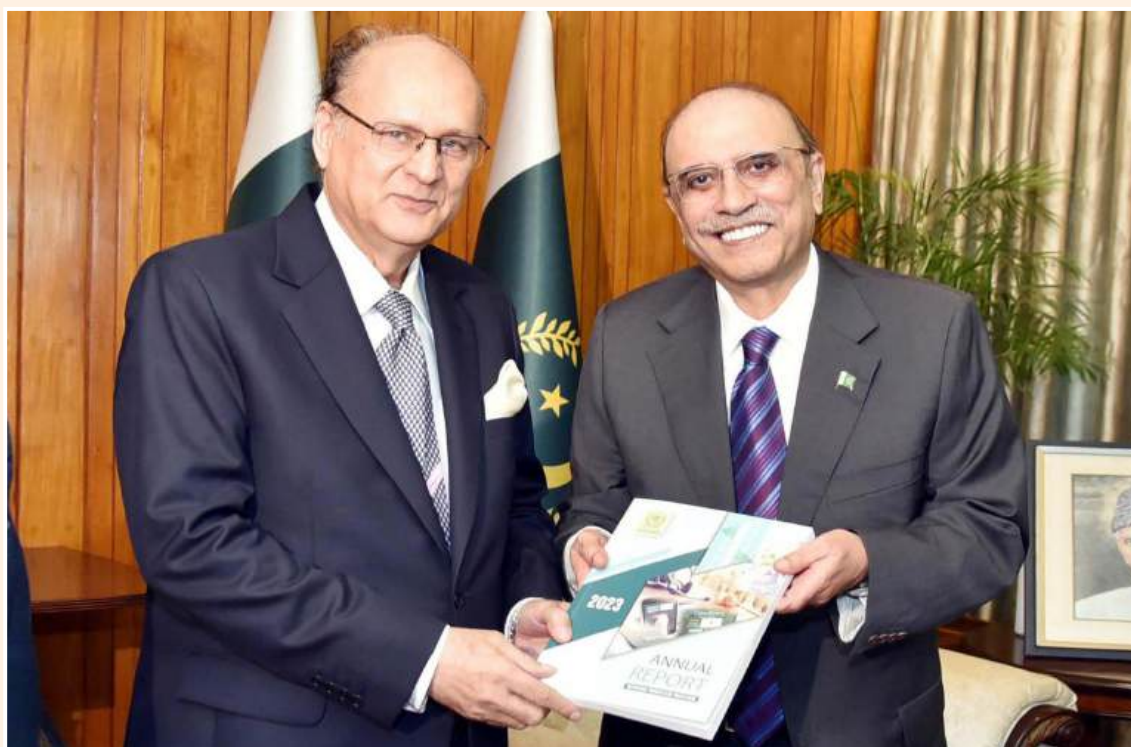
## President appreciates the role of Banking Mohtasib Pakistan

The President of the Islamic Republic of Pakistan, Mr. Asif Ali Zardari has lauded the role of Banking Mohtasib Pakistan (BMP) for processing over 25,000 complaints and providing monetary relief amounting to Rs 1.26 billion to banking customers in 2023.

The President expressed these views while talking to the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz, who called on him and presented the Annual Report of BMP to him at Aiwan-e-Sadr, Islamabad on April 19, 2024.

He also appreciated the Banking Mohtasib for providing an overall relief to the tune of Rs 6.4 billion to the complainants since its inception.

Briefing the President, the Banking Ombudsman highlighted the role and performance of the Banking Mohtasib for the expeditious redressal of grievances of the banking customers who had been deprived of their hard-earned money and life-savings by fraudsters.



He further informed that BMP had recently introduced a user-friendly system of online portal, making it easier for complainants to register their grievances.

Highlighting the significance of providing expeditious justice to the victims of fraudulent activities, President Zardari said that the Banking Mohtasib, as an institution, played an important role in delivering free-of-cost justice to the people and promoting good governance. He stressed the need to keep pace with technological advancements to expeditiously dispose of complaints.

The President also underscored the need to raise awareness about the role and services of the Banking Mohtasib against the maladministration of banks so that the maximum number of people could benefit from its services.

## President directs to provide relief of Rs 24.136 million to bank fraud victims

The President of Islamic Republic of Pakistan, Mr. Asif Ali Zardari has directed six banks to provide financial relief amounting to Rs 24.136 million to 31 victims of bank fraud. He gave these directions while deciding upon 31 representations filed against the decisions of the Banking Mohtasib, according to a Press Release posted on the President's website on 30th December, 2024.

Thirty-one representations filed by different banks and rejected by the President alongwith relief provided are as under:

Banks	Representation	Amount (Rs)
A	11	11,570,191/-
B	10	5,291,500/-
C	5	4,049,742/-
D	3	2,315,000/-
E	1	490,000/-
F	1	420,000/-
<b>6</b>	<b>31</b>	<b>24,136,433/-</b>

The victims were defrauded by individuals posing as bank representatives, who acquired sensitive banking details through deceptive phone calls and subsequently drained funds from their accounts. Upon discovering the fraudulent transactions, the customers approached their banks for redress, but were denied relief. The affected parties then sought relief through the Banking Mohtasib, who ruled in their favour. In response, the banks filed separate representations with the President, challenging these decisions.

Hearings were conducted at Aiwan-e-Sadr, and after listening to the petitioners and respondents and perusing the relevant record, the final decisions were delivered. The decisions reflect the President's commitment to providing justice and prompt relief to the people.

The President also emphasized the crucial role played by the Banking Mohtasib in safeguarding the citizens against the maladministration of commercial banks and financial fraud. He said that the Banking Mohtasib was a vital institution for the swift resolution of complaints, offering victims timely justice without the burdens of prolonged legal procedures.

The President has also encouraged the public to utilize the services of the Banking Mohtasib to address banking disputes and fraudulent activities.

# Receipt & Disposal of Complaints in 2024



## Receipt & Disposal of Complaints in 2024

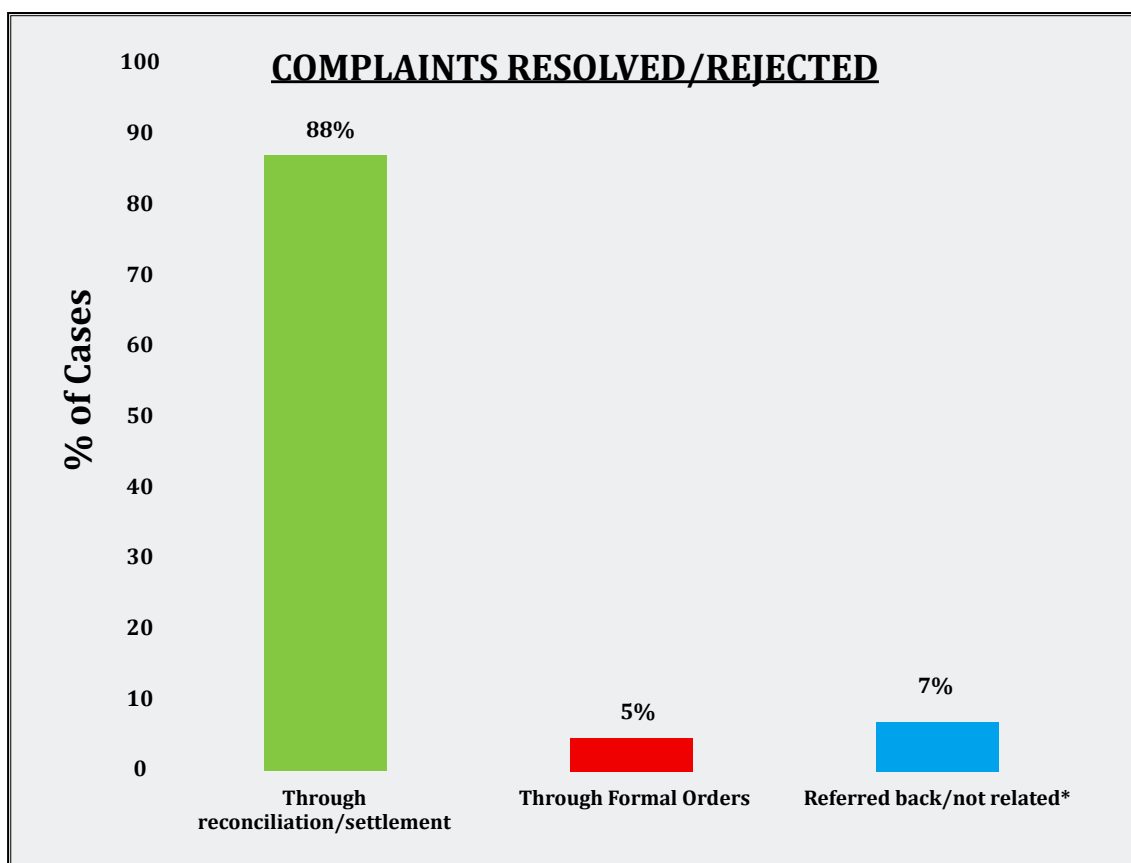
The law under which the institution has been established provides that the Banking Mohtasib Pakistan shall facilitate the amicable resolution of complaints. However, in certain situations a tripartite across the table dialogue or a formal hearing is arranged to provide opportunity to both the parties to present their view point face to face, after which appropriate findings are forwarded to the concerned parties for implementation.

During the period under review, 30,602 complaints were received while 10,944 complaints were brought forward from last year. Out of total 41,546 complaints in hand, 24,498 complaints were resolved amicably thorough reconciliation while after formal hearings, findings/ orders were passed in 1330 cases. About 1925 complaints were found incomplete and required further information or were rejected being frivolous and for want of jurisdiction as the same either pertained to insurance or related to microfinance banks/ fund managers or administrative issues of banks.

Complaints related to banking sector on Prime Minister's Portal (Government owned system based on Mobile Application) during the year under review worked out to 7,193. Thus, there was an overall increase of 6% in total number of complaints received during the year 2024 as compared to last year. Efforts are made to dispose of complaints expeditiously, however, 3283 complaints received during the last 45 days of the year 2024 have resulted in overall increase in complaints brought forward for the next year.

The receipt and disposal of complaints during the year are as under:

Complaints carried forward from 2023		10,944
New complaints received in 2024		30,602
<b>Total</b>		<b>41,546</b>
<b>Cases Decided / Disposed of</b>		<b>-</b>
Orders issued by Banking Mohtasib	1,330	-
Resolved amicably with the approval of Banking Mohtasib	24,498	-
Incomplete/not related/ seeking further information/ documents & service matters complaints	1,925	27,753
<b>Complaints outstanding as of December 31, 2024</b>		<b>13,793</b>
<b>Relief provided to the Complainants</b>		<b>Rs 1,646.093 (M)</b>

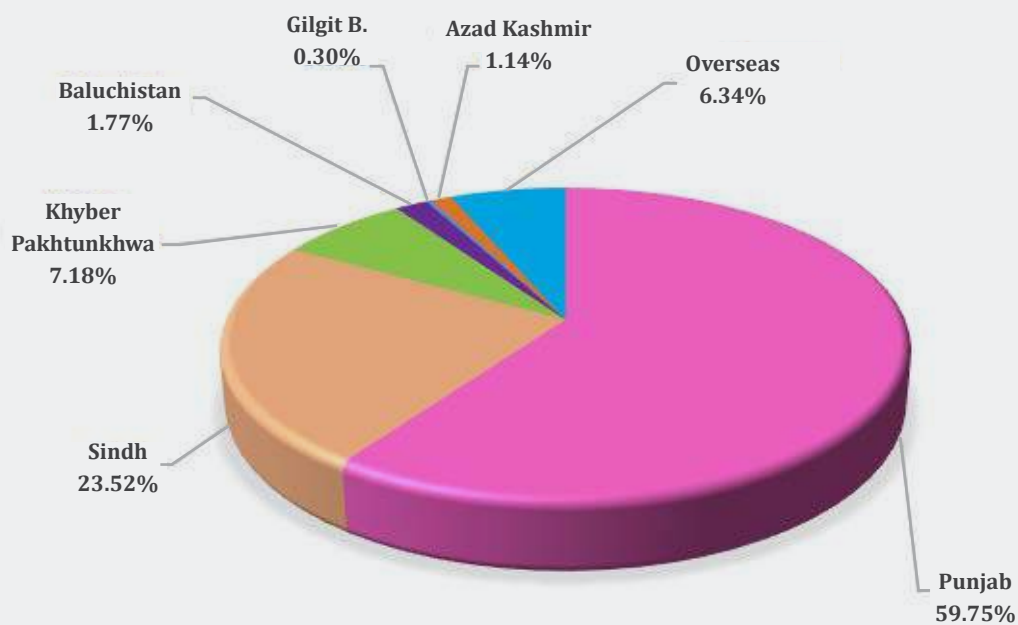
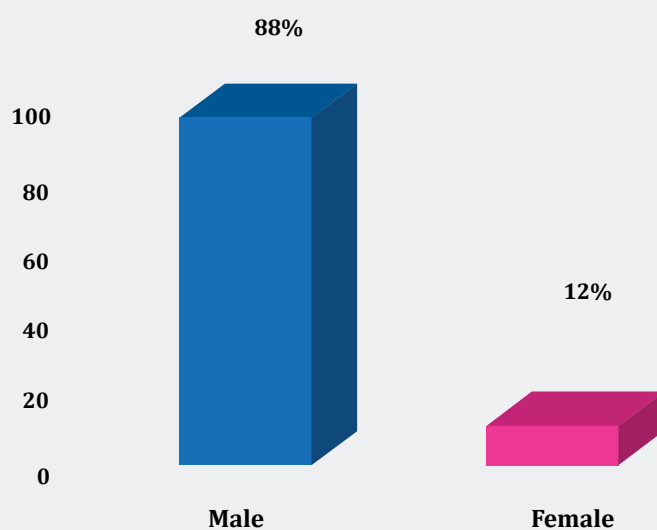


\* seeking further information/documents & service matters complaints

### Region-wise Break-up of Complaints received during the year 2024

The table given below shows region-wise breakup of complaints received against commercial banks with branches spread all over the country while the pie chart compares the percentage of complaints received (region-wise) during the year 2024.

Region	Complaints received during the year
Punjab	18,284
Sindh	7,198
Khyber Pakhtunkhwa	2,198
Balochistan	543
Gilgit Baltistan	91
Azad Kashmir	349
Overseas	1,939
<b>Total</b>	<b>30,602</b>

**TOTAL COMPLAINTS: REGION WISE 2024****Gender-wise Break-up of Complaints****GENDER - WISE BREAK-UP OF COMPLAINTS**

## Bank-wise Break-up of Complaints received during the year 2024

The following table shows number of complaints received against each bank during the year under review.

S. No.	Bank	Complaints Received		
		BMP Secretariat	Via Prime Minister's Portal	Total
1	AlBaraka Bank (Pakistan) Limited	84	30	114
2	Allied Bank Limited	1173	710	1883
3	Askari Bank Limited	473	82	555
4	Bank AL Habib Limited	732	274	1006
5	Bank Alfalah Limited	1978	433	2411
6	The Bank of Khyber	68	152	220
7	The Bank of Punjab	596	80	676
8	BankIslami Pakistan Limited	309	152	461
9	Bank Makramah Limited (Former Summit Bank)	57	65	122
10	Citibank N.A.	3	0	3
11	Deutsche Bank Limited	1	0	1
12	Dubai Islamic Bank Pakistan Limited	174	34	208
13	Faysal Bank Limited	1203	282	1485
14	First Women Bank Limited	12	0	12
15	Habib Bank Limited	4936	1632	6568
16	Habib Metropolitan Bank Limited	245	87	332
17	JS Bank Limited	725	285	1010
18	Meezan Bank Limited	3025	544	3569
19	MCB Bank Limited	1226	310	1536
20	MCB Islamic Bank	212	5	217
21	National Bank of Pakistan	1674	0	1674
22	Punjab Provincial Cooperative Bank Ltd.	8	4	12
23	Samba Bank Limited	17	16	33
24	Sindh Bank Limited	103	189	292
25	Silkbank Limited	506	241	747
26	Soneri Bank Limited	160	77	237
27	Standard Chartered Bank (Pakistan) Ltd	861	106	967
28	United Bank Limited	2576	782	3358
29	Zarai Taraqiati Bank Ltd.	154	0	154
30	Others	118	621	739
	<b>Total</b>	<b>23409</b>	<b>7193</b>	<b>30602</b>

# Overview of Last Three Years Performance



### Receipt and Disposal of Complaints during last Three Years

Year	Brought Forward from last year	Complaints Received	Total	Amicably Resolved through Reconciliation	Formal Order Passed after Hearing	Rejected	Carried Forward	Amount Granted/ Relief Provided to Complainants (Rupees in million)
2022	4772	30493	35265	21822	734	5102	7607	974.4
2023	7607	28830	36437	21886	676	2931	10944	1,268.4
2024	10944	30602	41456	24498	1330	1925	13793	1,646.1

### Total Number of Hearings Held and Orders Passed

The following table gives a view of total number of complaints resolved at this office by formal orders passed during the last three years.

Year	Number of Hearings	Orders Passed
2022	782	734
2023	760	676
2024	1530	1330
<b>Total</b>	<b>3,072</b>	<b>2,740</b>

## Banking Customers BEWARE

With a view to protecting your hard-earned savings, Banking Customers are warned that never share your banking/financial personal credentials with anyone via SMS, call, email or any other means.

It may be added here that the Bank will never ask for your secure banking information i.e. username/ password/login ID/PIN/OTP/ Card number/ CVV/ Expiry date.

Never respond to calls claiming you have won a prize and you share your financial and personal information to get the prize.



### Category-wise Complaints (2022-2024)

S. No.	Categories	2022	2023	2024
		No. of Complaints	No. of Complaints	No. of Complaints
1	Internet Banking/IBFT/E-commerce/Mobile Banking/ Mobile App/ Digital Banking	2574	4037	4535
2	Frauds	1323	3489	4171
3	Consumer Products (credit/debit cards, personal/ auto/ agri loans etc)	3875	3029	2871
4	Account Related/Blockage/Dormant etc	1245	2266	3208
5	Service Inefficiency/ Delays/ Others	3225	2144	2673
6	ATMs	2314	2138	2144
7	Foreign Currency Account/Bank Guarantees/ Remittance	47	839	731
8	Insurance / Bancaassurance	1038	776	405
9	Gross Dereliction of Duty/ Staff Misbehaviour	321	437	318
10	Pension Account	164	204	212
11	Exports/Imports	30	181	79
12	Parallel Banking	69	137	87
13	Utility Bills	114	55	62
14	Service Rules	220	53	60
15	Zakat Deduction	41	38	51
16	Breach of Confidentiality	13	34	24
17	Lockers	55	30	24
18	Miscellaneous/Others	846	1245	1754
19	Complaints received through Prime Minister's Portal	12979	7698	7193
	<b>Total</b>	<b>30493</b>	<b>28830</b>	<b>30602</b>

\* Miscellaneous includes complaints relating to Microfinance Banks, Investment Banks, SBP, National Savings, EOBI/Pension & others



Glimpses of  
Banking Mohtasib Pakistan  
**Annual Conference 2024**  
**“Focus on Values in  
Public Sector Services”**  
"عوامی خدمت کی اعلیٰ افتدار"

31<sup>st</sup> August 2024



## Mr. Ejaz Ahmed Qureshi Inaugurates the Annual Conference of Banking Mohtasib Pakistan on "عوامی خدمت کی اعلیٰ اقدار"



The First Ever Annual Conference of Banking Mohtasib Pakistan with the theme “Focus on Values in Public Sector Services” "عوامی خدمت کی اعلیٰ اقدار" was held at Karachi on August 31, 2024.

The Conference inaugurated by the Wafaqi Mohtasib Pakistan, Mr. Ejaz Ahmed Qureshi was addressed, among others, by the former Senator and Federal Minister, Mr. Javed Jabbar. The concluding session of the Conference was addressed by former Governor, State Bank of Pakistan, Dr. Ishrat Husain. The pioneer and first Banking Mohtasib Pakistan, Mr. Azhar Hamid also addressed the Conference participants. Director, Islamic Banking Department, State Bank of Pakistan, Mr. G.M. Abbasi made a thoughtful presentation on various aspects of Islamic Banking.

Other dignitaries attending the Conference were the former Banking Mohtasib, Mr. Mansur-ur-Rehman Khan and Senior Advisor, Wafaqi Mohtasib, Regional Office, Karachi, Mr. S. Anwar Haider. All the officials and staff members of Karachi Secretariat as well as officials from seven Regional Offices of Banking Mohtasib Pakistan attended the Conference and fully participated in the deliberations.

Inaugurating the Conference, the Wafaqi Mohtasib Pakistan, Mr. Ejaz Ahmed Qureshi said: “all the institutions of Ombudsman are doing public service by resolving the complainants’ grievances speedily”. He also gave a brief introduction of Asian Ombudsman Association (AOA). He said that the previous meeting of the Board of Directors and General Assembly of AOA was held at Islamabad. He also elaborately mentioned that facility of Resource Centre to serve as a store house of information and record about the grants, evolution and progress of Ombudsman in the Region is gradually coming up as about 25 countries in Asia have set up Offices of Ombudsman. He added that AOA Secretariat in collaboration with Wafaqi Mohtasib Pakistan has arranged various events / trainings of professional interest and plans to hold Webinars on relevant topics of public awareness and “Investigation Protocols” etc. Emphasizing the need for relevant trainings of the staff, he added that there is a need of highlighting, Banking Mohtasib’s role and function in promoting an efficient banking system in the country.

He also disclosed that the institution of Wafaqi Mohtasib Pakistan has ratified several International Human Rights- instruments and AOA is committed to addressing the “Human Rights” impact resulting from business activities.

He said that the Wafaqi Mohtasib launches public awareness campaign through interaction with media persons by holding press conferences, giving interviews to different TV channels, writing articles and publishing advertisements in newspapers.

He added that besides 24 offices, the Wafaqi Mohtasib has established five complaint centres in the remote areas of the country to provide justice to the Complainants at their door steps. The Wafaqi Mohtasib said that with a view to providing enhanced accessibility to the vulnerable and marginalized segment of the society, the officials of his institution visit remote areas and hear complaints of the people of those areas. Khuli Kutchery system is an extension of their outreach program, he said, adding that the Kutcheries are arranged in remote districts of Karak, Hangu, Harrai, Turbat, Dargai etc.

He was full of praise for Banking Mohtasib Pakistan who had arranged this Conference, first ever since inception of the Office of Banking Mohtasib in 2005, which has provided staff members from all over Pakistan to sit together and discuss issues of mutual interest. He wished that the events of such nature would be regularly followed so as to create a cordial and homogenous working atmosphere of the organization.



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presenting a Memento to Mr. Ejaz Ahmed Qureshi, Wafaqi Mohtasib Pakistan

Speaking on the occasion, the former Federal Minister, Mr. Javed Jabbar appreciated the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz for the remarkable initiative taken by him to hold the First Ever Conference in which all the officers and staff across Pakistan (BMP Secretariat and Regional Offices) are participating. “This reflects his vision and empathy for the people that the Conference has been held after 19 years of the establishment of the Banking Mohtasib Pakistan Secretariat”, he added.

He also emphasized upon the audience to inculcate in their lives the values of respect, integrity, etc. to ameliorate the lot of the people. Mr. Javed Jabbar stressed upon the need for providing financial assistance to women engaged in small and medium enterprises. In this regard, he asked the Banking Mohtasib to use his good offices to persuade the State Bank of Pakistan officials as well as high-ups of commercial banks to provide finances to SMEs, particularly to women, on soft terms.

Mr. Javed Jabbar while appreciating the role of State Bank of Pakistan for its stability, credibility and performance over the last 77 years has asked other institutions to emulate it. Besides State Bank, the other institution to admire is NADRA for its excellent performance over the years. “NADRA has gained international recognition for its solid data base”, he added.

The former Governor, State Bank of Pakistan, Dr. Ishrat Husain in his concluding address to the Conference advised the institution of Banking Mohtasib to be objective, neutral and conduct due diligence without bias while dealing with the complaints. He suggested to the Banking Mohtasib to hold meetings with Pakistan Banks' Association to devise such strategies so as to reduce public complaints against banks.

He also stressed upon the need for training of the personnel of Banking Mohtasib Offices as human resource requires attention for efficient progression of par excellence in today's world of technological development. He added that if Banking Mohtasib Organization adopts best practices in the banking field, it would become the best institution of the country.

Dr. Ishrat Husain also spoke about the reasons for the establishment of Banking Mohtasib Office in 2005 when he was the Governor, State Bank of Pakistan. It may be added here that Dr. Ishrat Husain had inaugurated the Office of Banking Mohtasib in 2005.

Besides the Guest Speakers, Mr. Azhar Hamid, the pioneer and the first Banking Mohtasib also graced the occasion and spoke about his rich experience when he was associated with this forum. Mr. Mansur-ur-Rehman Khan, who had succeeded him as Banking Mohtasib was also very warmly received by the participants to the Conference.



Mr. Sirajuddin Aziz, who conceptualized the idea of holding the Conference of Banking Mohtasib Pakistan, gave away Mementoes to all the Guest Speakers, besides presenting the welcome address. Bouquets were also presented to the Guests and In-house Speakers by female employees of Banking Mohtasib Pakistan.

Mr. Farhat Saeed, Senior Advisor successfully implemented the idea of Mr. Sirajuddin Aziz. He also spoke about the aims and objectives of the Conference.

Mr. Nawroz Mohammad Ali, Advisor, Banking Mohtasib Pakistan made a presentation on "Measures to Enhance Security of Digital Banking Products and Services" while Mr. Muhammad Aun Abbas, Assistant Director, Banking Mohtasib Pakistan also made a presentation on "Breaking Pakistan's Debts Spiral". All the presentations were followed by an interactive questions and answers sessions.

Ms. Samreen Tanveer, Assistant Director at Banking Mohtasib Pakistan Office conducted the whole proceedings of the Conference in an efficient and effective manner.

## Mr. Sirajuddin Aziz Appreciates Officers/Staff for Making Banking Mohtasib Pakistan's Annual Conference Successful

The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz has appreciated all the officers /Staff of his institution for making the first ever Annual Conference of BMP successful.

In a congratulatory message to his colleagues on September 2, 2024, Mr. Sirajuddin Aziz extended special gratitude to the officers of the seven offices, who attended the conference despite the inclement weather.

Following is the complete text of his message:

"I wish to express my appreciation for your active participation to make the first ever Annual Conference of the Banking Mohtasib Pakistan Office successful. In particular, a special gratitude to our visitors from other offices, who despite of inclement weather made it possible to attend.

The proceedings were done very well. The pre and during the day organization was very good. A commendation for all the sub-committee members who remained actively involved.

It is sincerely hoped that each of you interacted sufficiently to forge bonds and working relationship. From the external and internal speakers, there were several points to take home.

The presentations by Mr. Nawroz Mohammad Ali and Mr. Muhammad Aun Abbas were very good, but time constraints did not allow for active participation. I shall devise plans to complete these presentations.

It is laudable that two of our female colleagues, Ms. Samreen Tanveer and Ms. Bibi Zareena, executed amazing confidence on the stage; Ms. Samreen Tanveer's role as anchor of the event was stupendous.

I invite you to kindly offer comments, observation and suggestions to identify lapses and to point out areas where we could improve in the future.

Finally, heartfelt thanks and gratitude to Mr. Farhat Saeed for having organized and supervised the Annual Event".



## STR—Suspicious Transaction

Suspicious transaction or activity is related to money laundering or terrorism financing, which is required to be reported and filed by the reporting agencies as per section 7(1) of AML Act, 2010. The reporting agencies should have effective systems and mechanisms in place to identify and report such transactions. The access to the related data bases like Proscribed persons / entities record. Risk screening data bases etc., have also acquired by reporting agencies to their maximum.

## Photo Gallery of Annual Conference of Banking Mohtasib Pakistan on “Focus on Values in Public Sector Services.”



Former Federal Minister, Mr. Javed Jabbar addressing the Annual Conference



Former Governor, State Bank of Pakistan, Dr. Ishrat Husain addressing the Annual Conference



First Banking Ombudsman, Mr. Azhar Hamid expressing his views during the Annual Conference



Senior Advisor, Mr. Farhat Saeed speaking at the Annual Conference



Director, Islamic Finance Policy Department, State Bank of Pakistan, Mr. G. M. Abbasi making a presentation at the Annual Conference



Advisor, Mr. Nawroz Mohammad Ali making a presentation



Assistant Director, Mr. Muhammad Aun Abbas making a presentation



Assistant Director, Ms. Samreen Tanveer conducting the proceedings



Investigation Officer, Bibi Zareena reciting verses from the Holy Quran



Photograph taken on the occasion of the Annual Conference of Banking Mohtasib Pakistan. Mr. Azhar Hamid and Mr. Mansur-ur-Rehman Khan, the first and second Banking Ombudsman are also seen in the picture

## Photo Gallery



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presenting a Memento to Dr. Ishrat Husain, Former Governor, State Bank of Pakistan



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presenting a Memento to Former Federal Minister, Mr. Javed Jabbar



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presenting a Memento to Mr. G. M Abbasi, Director, Islamic Finance Policy Department, State Bank of Pakistan



Former Governor, State Bank of Pakistan, Dr. Ishrat Husain presenting a Memento to Mr. Nawroz Mohammad Ali, Advisor, Banking Mohtasib Pakistan



Former Governor, State Bank of Pakistan, Dr. Ishrat Husain presenting a Memento to Mr. Muhammad Aun Abbas, Assistant Director, Banking Mohtasib Pakistan



Group Photo of the participants taken on the occasion of the Annual Conference of Banking Mohtasib Pakistan with Dr. Ishrat Husain, former Governor, State Bank of Pakistan

## Photo Gallery



Ms. Bibi Zareena presenting a bouquet to Wafaqi Mohtasib, Mr. Ejaz Ahmed Qureshi



Ms. Humaira Hassan presenting a bouquet to Mr. Javed Jabbar, Former Federal Minister



Ms. Nighat Jabeen presenting a bouquet to Mr. Azhar Hamid, First Banking Ombudsman



Ms. Naseema Yousuf presenting a bouquet to Mr. Mansur-ur-Rehman Khan, Former Banking Ombudsman



Beenish Khan presenting a bouquet to Dr. Ishrat Husain, Former Governor – State Bank of Pakistan



Ms. Mehak Kiran presenting a bouquet to Mr. G. M Abbasi, Director – Islamic Finance Policy Department

**Mr. Sirajuddin Aziz hosted a dinner as 'Curtain Raiser' to the Participants of the Annual Conference of Banking Mohtasib Pakistan on 30th August, 2024.**



Mr. Sirajuddin Aziz welcoming the Guests at a dinner hosted by him in honour of the participants of Annual Conference of Banking Mohtasib Pakistan



Group Photo taken on the occasion of a dinner hosted by the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz.  
(From L to R) Mr. Mansur-ur-Rehman Khan - Former Banking Ombudsman, Mr. S. Anwar Haider - Senior Advisor, Wafaqi Mohtasib Pakistan, Mr. Sirajuddin Aziz - Banking Mohtasib Pakistan, Mr. Ejaz Ahmed Qureshi, Wafaqi Mohtasib Pakistan, Mr. Mumtaz Ali Shah - Federal Insurance Ombudsman, Mr. Muhammad Sohail Rajput - Provincial Ombudsman, Sindh & Mr. Farhat Saeed, Sr. Advisor, Banking Mohtasib Pakistan



Female participants photographed at the dinner



Group photograph of officials taken on the occasion

### **Dinner hosted in honour of Participants of Banking Mohtasib Pakistan Annual Conference on “Focus on Values in Public Sector Services.”**

A dinner was hosted in honour of the participants of Banking Mohtasib Pakistan Annual Conference on “Focus on value in Public Sector Services” at Services Club, Karachi at the conclusion of the Conference on 31st August, 2024.

Speaking on the occasion, the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz announced payment of Honoraria to all the employees of the Banking Mohtasib Office who contributed to make the event a huge success.

He also announced that such Conferences will now be held every year for the benefit of the officers and staff of the institution.

Senior Advisors, Mr. Farhat Saeed and Mr. Muhammad Ali Jangda also spoke on the occasion.



# Activities



### Mr. Sirajuddin Aziz presents Annual Report of the Banking Mohtasib Pakistan to SBP Governor, Mr. Jameel Ahmad



The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz called on the Governor, State Bank of Pakistan, Mr. Jameel Ahmad on 28th March, 2024.

He presented the Annual Report of the Banking Mohtasib Pakistan for the year 2023 to SBP Governor during the meeting, which was also attended by the Senior Advisor, BMP, Mr. Farhat Saeed.

Matters of mutual interest were discussed in the meeting. Certain suggestions were also made by the Banking Mohtasib as regards improvements in the banking services with a view to protecting the banking customers from growing fraudulent activities.



### Ex-Governor SBP Calls on Banking Mohtasib Pakistan



The former Governor, State Bank of Pakistan, Mr. Tariq Bajwa called on the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz at BMP Secretariat, Karachi on 22nd January, 2024. The meeting was also attended by all the Senior Advisors of BMP, as well as Legal Advisor.

## Banking Mohtasib Pakistan calls on the Governor Punjab



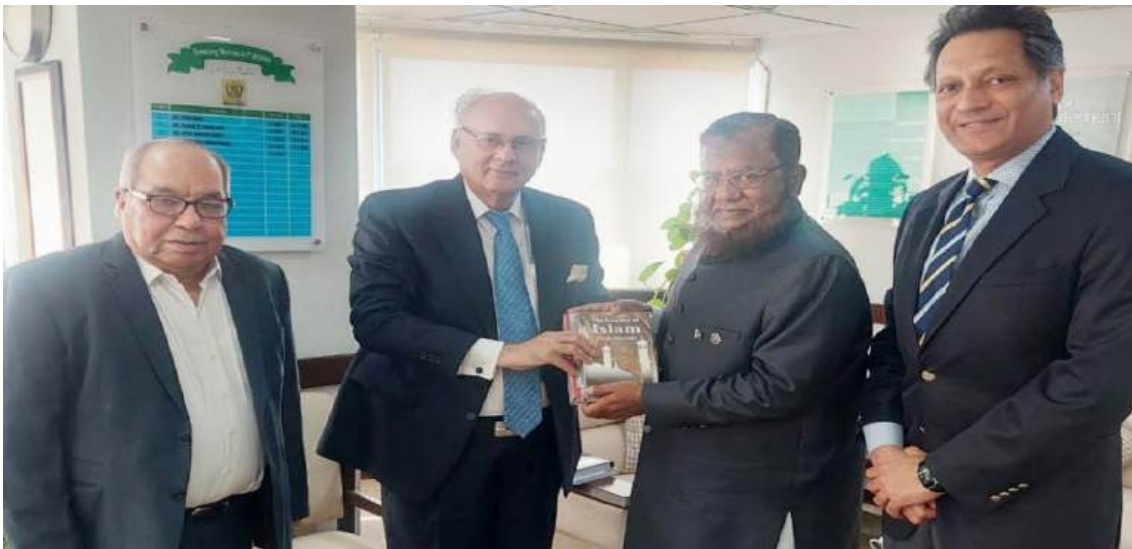
The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz called on the Governor Punjab, Sardar Saleem Haider Khan at Governor House, Lahore on 30th May, 2024.

During the meeting, Mr. Sirajuddin Aziz presented the Annual Report of BMP for the year 2023 to the Governor Punjab. He also briefed the Governor Punjab about the performance and achievements of his organization. Discussions were also held on matters of mutual interest.

The Governor Punjab appreciated the performance of Banking Mohtasib Pakistan.



## Federal Tax Ombudsman visits the Office of Banking Mohtasib Pakistan



The Federal Tax Ombudsman, Mr. Asif Jah met the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz at BMP Secretariat, Karachi on 28th February, 2024. The meeting was also attended by the Senior Advisor, BMP, Mr. Farhat Saeed and Advisor Legal, Federal Tax Ombudsman, Karachi Secretariat, Mr. Almas Ali Jovindah, Matters of mutual interest were discussed during the meeting.

## Banking Mohtasib Pakistan Mr. Sirajuddin Aziz attends 30th Forum of Pakistan Ombudsman Meeting



The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz attended the 30th Forum of Pakistan Ombudsman meeting held at Punjab Civil Officers Mess (PCOM), Lahore on 17th December, 2024. The meeting was hosted by the Office of the Provincial Ombudsman, Punjab led by Ms. Ayesha Hamid (Ombudsman of Punjab).

Mr. Sirajuddin Aziz briefed the participants of the meeting about the working of Banking Mohtasib Pakistan and its achievements and future plans to improve the efficiency of the institution.



Photograph taken on the occasion of the 30<sup>th</sup> Forum of Pakistan Ombudsman Meeting held at Lahore on 17<sup>th</sup> December, 2024

## Delegation of General Secretariat of Banking Ombudsman Bahrain on Study Visit to Pakistan



The Organization of Islamic Cooperation of Ombudsman Association (OICOA) Secretariat organized a week-long study visit of a five-member delegation of Senior Officers of Investigation Cell of the General Secretariat of the Ombudsperson of Bahrain to Pakistan from 28th September to 4th October, 2024 with the primary objective of examining best practices in Ombudsmanship and enhancing inter-institutional cooperation.

On nomination by the Banking Ombudsman, Sr. Advisor, Mr. Muhammad Ali Jangda and Ms. Samreen Tanveer, Assistant Director (Coord.) visited Islamabad on 2nd October, 2024 and Mr. Jangda made a presentation on the functioning of the Banking Ombudsman to the delegates from Bahrain.

Mr. Jangda on behalf of the Banking Ombudsman distributed souvenirs to the delegates and officials of OICOA Secretariat after his presentation.

A recorded video message from the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz regarding how the Banking Ombudsman effectively resolves disputes and enhances consumer protection and trust in Pakistan's financial sector was also played on 2nd October, 2024.

Following is the complete transcribed version of the Banking Mohtasib's video Message.

*"I would like to extend on behalf of the Banking Ombudsman Office a very warm welcome to the Bahrain delegation led by Brother Hon'ble Muhammad Taufiq Taqi. It's a pleasure for us to have you here. I would have personally wanted to welcome you in Islamabad, but regrettably, I have overseas commitment and, therefore, I could not be able to make it. However, two of my colleagues Sr. Advisor, Mr. Muhammad Ali Jangda and Assistant Director, Ms. Samreen Tanveer will be taking you through particular presentation covering the areas of operations of Banking Ombudsman Pakistan's Office.*

*Gentlemen, it's a pleasure to recall and recap that Bahrain and Pakistan enjoy a long traditional brotherly relationship, however, its my firm opinion that there is still a lot of room for growth and development in this relationship. We can add greater depth in meaning to that relationship that exists between our two brotherly countries, particularly in the areas of Finance, Economic and Social Sector. The Banking Mohtasib Pakistan Office established in 2005 and later on streamlined through an Act of Parliament in the year 2013. We have since then operating as an independent autonomous Statuary Body providing relief to clients and complainants who have got grievance against financial institutions. I am very pleased to inform you that last year we were able to provide a relief of 1.268 billion rupees to several complainants who had issues in conducting their financial transactions. As you Gentlemen are properly aware of the fact that with the advancement in digital banking, incidence of fraud are also growing. It is, therefore, extremely imperative for us to have in place a quick judicial mechanism, a legal forum that's what we are familiar with to be set up possibly in areas that do no have this facility so as to provide quick relief to the members of public who have been deprived of their rightful money. I hope that the presentation by my colleagues will add meaning and value to your understanding of what we are doing here. It will be a pleasure for us to participate with you and extend to you anywhere training and development facilities relating to banking and the financial industry in general. I hope you have a very pleasant stay in Pakistan and a safe journey back home. I hope that someday we will be able to meet in person either in Pakistan or in Bahrain. Have a very pleasant stay. Thank you very much."*

During their visit to Islamabad, Mr. Jangda and Ms. Tanveer also visited the Regional Office of the Banking Mohtasib at Rawalpindi and met officials of the Regional Office as well as of SBP, BSC Rawalpindi.



Senior Advisor, Mr. Muhammad Ali Jangda making a presentation on functioning of Banking Ombudsman to Delegation of Ombudsperson of Bahrain

## Distribution of Souvenirs to Delegates from Bahrain & Officials of Organization of Islamic Cooperation of Ombudsman Association (OICOA)



Group photo taken on the occasion of Sr. Advisor, Mr. Muhammad Ali Jangda and Assistant Director, Ms. Samreen Tanveer's visit to Rawalpindi Regional Office on 2nd October, 2024

## Ex-Deputy Governor State Bank of Pakistan Mr. Riaz Riazuddin Spoke on 'Debt Management & Sustainability Issues in Pakistan'



In a series of lectures planned for grooming the staff of Banking Mohtasib, the former Acting / Deputy Governor, State Bank of Pakistan, Mr. Riaz Riazuddin was invited to make a presentation on “Debt Management and Sustainability Issues in Pakistan” at the Banking Ombudsman Secretariat, Karachi on 25th April, 2024.

Besides the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz, Senior Advisors, Advisors and the Investigation Officers attended the said presentation.

While tracing the history of Debt Accumulation in Pakistan, Mr. Riaz Riazuddin explained the Assessment of Debt Sustainability by outlining Simple Indicators of Debt Sustainability, Classical Approach, Debt Intolerance Approach, Arrow Approach and IMF Approach. He also dealt with Public Debt and Development Projects in his presentation.

Referring to the history of Debt Accumulation, he mentioned that Pakistan has had elevated levels of debt at several points in its history. As far back as 1975, the total debt had reached a level of 63 percent of GDP, he said, adding that Public debt reached a peak of 110 percent of GDP in 1999.

He added that while Pakistan had only fiscal deficits in each of all 48 years from FY76 to FY23, it was able to generate ten primary surpluses between FY96 & FY07. Nine of these happened after debt restructuring of FY99. 'Unless we show fiscal consolidation by raising revenues covering at least the non-interest expenditure, our debt is unlikely to fall', he added.

He outlined the following points with regard to Assessment of Debt Sustainability:

- While the debt to GDP (mp) is customarily used to indicate the relative debt stock burden in the economy, it does not convey the repayment burden.
- Flow variables like revenues and interest payments are used to evaluate ratios indicating repayment burden for the total public debt.

- For the external debt repayment burden, foreign exchange earnings and servicing payouts like interest or foreign exchange reserves are also used. Some indicators are:

- a) Public debt as ratio of revenues.
- b) Interest payments as ratio of revenues.
- c) Debt servicing to exports.
- d) Foreign Exchange reserves as a ratio of external debt.

While referring to Simple Indicators of Debt Sustainability and Public debt to revenue ratio, he concluded that in FY22, this ratio was 641% while in FY23, it increased to 694%.

- Although debt to GDP is lower at 79.6% compared with 110% in FY99, the risk of default is the same as in FY99.

While referring to the Classical Approach to Debt Sustainability, he outlined the following important points:-

- The sustainability of fiscal policy is contingent upon generating future primary surpluses equal to the current level of the debt ratio.

- If current and future surpluses are insufficient, the government must either raise taxes or cut expenditure.

- If the sustainable ratio exceeds the current ratio, adjustments such as tax increases or expenditure cuts are necessary for fiscal policy and debt to return to sustainability.

- Medium-term tax gaps for Pakistan are estimated to range between 4 to 8 percentage points of GDP. This implies that the government must increase its tax-to-GDP ratio by about 6 percentage points in the medium-term to maintain fiscal sustainability.

With reference to Debt Intolerance Approach, he said that Pakistan's external debt to GDP was 33.4% of GDP in FY23. The study, conducted two decades ago, displays signs of high debt intolerance.

Referring to Arrow Approach, he said that Arrow et al. (2004) proposed a criterion that intertemporal social welfare should not decrease over time. For the external sector, Pakistan has a comprehensive dataset known as the "International Investment Position" (NIIP), he said, adding that the NIIP, calculated as the difference between assets and liabilities, was USD 131.8 billion in the negative at end-June 2023. 'Elevated gross financing needs continue to pose high risks to debt sustainability, particularly as fiscal and reserve buffers have been depleted. In this regard, timely disbursements of committed bilateral and multilateral support is critical in the period ahead,' he added.

The presentation was followed by a question-answer session. In the end, the Banking Mohtasib, Mr. Sirajuddin Aziz appreciated the well researched presentation of Mr. Riazuddin, which he said would help the officers of Banking Mohtasib Office in understanding the intricate economic issues.



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presenting a Memento to the Ex-Acting/Deputy Governor, State Bank of Pakistan, Mr. Riaz Riazuddin



Ms. Samreen Tanveer, Assistant Director presenting a bouquet to Mr. Riaz Riazuddin on his arrival at BMP Secretariat, Karachi

## ACRONYMS

<b>PAN</b>	Permanent Account Number.	<b>CNN</b>	Cable News Network.
<b>ATM</b>	Automatic Teller Machine.	<b>CCTV</b>	Closed Circuit Television.
<b>SIM</b>	Subscriber Identity Module.	<b>KYC</b>	Know Your Customer.
<b>UPI</b>	Unified Payment Interface.	<b>AML</b>	Anti Money Laundering.
<b>OTP</b>	One Time Password.	<b>CDD</b>	Clientele Due Diligence.
<b>GPS</b>	Global Positioning System.	<b>PEP</b>	Politically Exposed Person.
		<b>EDD</b>	Enhanced Due Diligence.

### Banking Mohtasib Meets SBP Governor



A view of a meeting between the SBP Governor, Mr. Jameel Ahmad and Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz at SBP, Karachi on 24th December, 2024. Matters of mutual interest were discussed during the meeting

### Meeting of Banking Mohtasib Pakistan Mr. Sirajuddin Aziz with Senior Officials of ABL at Lahore



With a view to ensuring speedy disposal of complaints and to amicably resolve the grievances of banking customers to the maximum, the Banking Mohtasib Pakistan holds regular consultations/meetings with the officials of commercial banks.

The consultations with the executives of commercial banks help the stakeholders comprehend the issues raised and difficulties faced by customers at large and to take effective measures for speedy and effective resolution of their grievances.

In a series of such meetings Senior Officials of Allied Bank Limited held a meeting with Mr. Sirajuddin Aziz, Banking Mohtasib Pakistan at BMP Regional Office, Lahore on 5th March, 2024. Mr. Shahzad UR Rehman, Divisional Head, Complaint Management, Syed Mujtaba Gillani, Group Head, Fraud Risk Management Regulatory Reporting, Mr. Asif Bashir, Chief, Special Assets Management Group (SAMG), Muhammad Asif Paracha, Group Head, Legal Affairs, Mr. Mohsin Mithani, Chief Digital Banking, Mr. Irfan Saeed Dar, Group Head, Branch Banking Operations and Mr. Tariq Mehmood Shahid, Chief Compliance attended the meeting on behalf of Allied Bank Limited whereas Senior Advisors, Mr. Farhat Saeed, Mr. Anwer A. Chaudhry and Mr. Saleem Akhtar besides Advisor, Mr. Arif Mahmood Butt and Legal Advisor, Mr. Shahid Mahmud attended the meeting from Banking Mohtasib Pakistan's side.

## Federal Tax Ombudsman Interns briefed about Role and Functions of Banking Mohtasib Pakistan



The Federal Tax Ombudsman has initiated a program of internship at their Secretariat to share the expertise of Ombudsman offices with the new entrants in the professional field. As a result, the interns also visited Banking Mohtasib Secretariat, Karachi on 4th September, 2024 to have firsthand knowledge of the functions of BMP. One of the interns, Mr. Shahzad Ali in his remarks in an email to the Banking Mohtasib on September 5, 2024 described the experience as under:

"The comprehensive overview of the Ombudsman's role and functions was a true masterclass, enlightening us on the intricacies and significance of your good office. Your passion for excellence and commitment to serving the people were shone through in every aspect of our interaction.

What struck us most was the remarkable efficiency and corporate-like culture of your department, setting a benchmark for both government and private institutions. Your leadership and dedication to excellence are truly inspiring, and we feel privileged to have experienced it firsthand.

Please accept my heartfelt thanks for your kindness, guidance, and for making our visit an unforgettable experience".

The two interns - Mr. Shahzad Ali and Ms. Tooba Arshad Khan - from FTO Secretariat on their visit to Banking Mohtasib Pakistan, Karachi Secretariat on September 4, 2024 were briefed on the working of the Banking Mohtasib by the Sr. Advisor, Mr. Muhammad Ali Jangda, Mr. Shahid Mahmud Khan, Legal Advisor and Assistant Director – Investigation, Mr. Muhammad Aun Abbas.

## Banking Mohtasib Pakistan holds Hearing at Mirpur, AJK

In order to facilitate the banking customers and resolve their grievances, the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz held hearing of complaints against commercial banks at Mirpur, AJK on 30th July, 2024. It was the second hearing at Mirpur. The first ever hearing at Mirpur was held on 22nd May, 2023.

It may be pointed out that grievance of banking customers is heard and resolved by Banking Mohtasib free of cost. Holding of hearing at Mirpur is in line with the Banking Mohtasib's aim to provide maximum relief to the Complainants at their doorsteps to economize their expenditure on travel from far flung areas.



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz hearing complaints at Mirpur, AJK



SVP/Regional Head, NBP, Mirpur, Mr. Faheem Jan presenting a bouquet to the Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz on his visit to Mirpur, AJK

## Banking Mohtasib Mr. Sirajuddin Aziz hearing complaints at Karachi Secretariat & Regional Offices



Karachi Secretariat



Lahore Regional Office



Faisalabad Regional Office



Rawalpindi Regional Office



Banking Mohtasib, Mr. Sirajuddin Aziz being welcomed on his first ever visit to Faisalabad Regional Office

## Mr. Sirajuddin Aziz Inaugurates Refurbished Peshawar Regional Office

The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz inaugurated the newly refurbished Peshawar Regional Office on November 6, 2024.

The inauguration ceremony of Peshawar Office was attended, among others, by the Senior Advisor BMP, Syed Faheemuddin Ahmed, Chief Manager, Peshawar, SBP, BSC, Mr. Waqar Ali, Legal Advisor BMP, Mr. Shahid Mahmud Khan. Hearing was also held at the refurbished Office.



Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz and Senior Advisor, Syed Faheemuddin Ahmed inaugurating the newly refurbished Hearing Room of Peshawar Regional Office



Hearing at refurbished Peshawar Regional Office



Chief Manager, SBP-BSC Peshawar, Mr. Waqar Ali welcoming Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz at the Peshawar Regional Office

# Human Resource Development Efforts



## Distribution of Certificates to Officers/Staff of Banking Mohtasib Secretariat for participation in Webinars

The Asian Ombudsman Association has arranged two Webinars on “Protection against Harassment at Workplace” and “Building Public Awareness: An Essential Feature of Ombudsmanship” at Federal Ombudsman Secretariat Islamabad on March 27, 2024 and May 15, 2024 respectively.

All female staff of the Banking Mohtasib Pakistan Secretariat along with Mr. Shahid Mahmud Khan, Legal Advisor, Mr. Shahan Sheikh, Deputy Director and Mr. Rana Irfan Shahid, Assistant Legal Advisor attended the Webinar on “Protection against Harassment at Workplace”, while Advisors M/s. Nawroz Mohammad Ali, Arif Mahmood Butt, Ali Hussain Brohi; Consultants M/s. Riaz Hussain Hamdani, Yameen Farooqi and Muhammad Junaid Khan; Assistant Directors M/s. Satish Inder Jesrani, Kazi Raheel Javed and Abdul Qadeer Sheikh attended the Webinar on “Building Public Awareness: An Essential Feature of Ombudsmanship”.

The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz and Senior Advisor, Mr. Farhat Saeed distributed certificates to the officials, who attended the Webinars at a ceremony held at BMP Secretariat, Karachi on 4th July, 2024.



### Mr. Sirajuddin Aziz Presides over Interactive Learning Session



The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz presided over a discussion/ interactive learning session on 'Personal Reputation and Development', on 17th April, 2024. The two-hour interactive session held at Karachi Secretariat was attended by officers/ staff of Banking Mohtasib Pakistan.

### Promotion of Learning Culture at Banking Mohtasib Pakistan



To foster and build a learning culture, all Senior Officers and Staff members of Banking Mohtasib Pakistan are being encouraged to not only acquire knowledge and skills, but are being proactively encouraged to share their experiences.

To bolster this activity, Mr. Muhammad Ali Jangda, Senior Advisor made a presentation on "State Bank Guidelines on Enhancement of Security of Digital Banking Products and Services to Mitigate Fraudulent Activities (SBP Circular # 04/2023)" on 23rd January, 2024 while Mr. Nawroz Muhammad Ali, Advisor made a presentation on "RAAST (a product introduced by SBP)" on 7th February, 2024.

The Banking Mohtasib Pakistan, Mr. Sirajuddin Aziz appreciated both the Officers for their thought provoking presentations. Both the presentations were attended by Officers and Staff of the Banking Mohtasib Office.

## Asian Ombudsman Association (AOA) Online Meeting on “Business & Human Rights”

The Asian Ombudsman Association (AOA), and the Office of the Commissioner for Human Rights, Republic of Azerbaijan held an online meeting on “Business and Human Rights (BHR)” on 16th December, 2024.

The Azerbaijan Ombudsman Institute presented its experience in drafting the National Baseline Assessment on BHR. Mr. Llvio Sarandrea, Global Policy Advisor for Business and Human Rights at UNDP also presented his insight on the development process of BHR frameworks. The participants shared their perspective on issues of business and human rights and requirement for future training activities in this area.

This theme of the meeting was in line with article 4(2) of the AOA Bye Laws which provide for activities aimed at promoting professionalism in the discharge of ombudsman’s functions, sharing of information and experiences among the ombudsmen in the region. This meeting was planned as part of AOA’s awareness raising activities and explore ways to effectively engage ombudsman institutions to this area of growing importance in today’s global landscape. The meeting is expected to serve as a foundation for establishing a platform of focal persons from each AOA member institution and facilitating regular exchange of updated information, best practices and collaborative initiatives on BHR.

Following officials of the Banking Mohtasib Pakistan attended the online meeting:

M/s Muhammad Yousuf Imran, Noman Qureshi and Nawroz Mohammad Ali (Advisors), Mr. Shahid Mahmud, Advisor – Legal; M/s Muhammad Ikram & Muhammed Sohail Jangda (Deputy Directors); Mr. Muhammad Junaid and Ms. Fouzia Salman (Consultants), Mr. Satish Inder Jesrani (Assistant Director) and Ms. Beenish Khan (Investigation Officer).

## Course on 'Financial Fraud - (From Prevention to Examination)'

Syed Kashif Hussain Bokhari, Executive Vice President, Head of Crime Control Management, Faysal Bank Limited and Mr. Sajjad Nawaz, Head of Fraud Risk Management, Meezan Bank Limited conducted a course on 'Financial Fraud- (From Prevention to Examination)' at a local hotel in Karachi on 27th April, 2024. Mr. Kazi Raheel Javed, Assistant Director, Banking Mohtasib Pakistan attended the course.



### Senator Mushahid Hussain Sayed addresses Webinar on “Building Public Awareness: An Essential Feature of Ombudsmanship”

The Asian Ombudsman Association (AOA) held a Webinar on “Building Public Awareness: an Essential Feature of Ombudsmanship” on 15th May, 2024. The Webinar was hosted by the Federal Ombudsman of Pakistan in pursuance of the decision of the 17th Meeting of the AOA General assembly. The theme of the Webinar was in line with Article 4(2) of the AOA Bye Laws which provide for such activities to facilitate exchange of information and experience among the Ombudsmen in the region.

The Webinar was opened by Federal Ombudsman of Pakistan and President Asian Ombudsman Association, Mr. Ejaz Ahmed Qureshi while Senator Mr. Mushahid Hussain Sayed as key person addressed the Webinar.

It may be added here that the Paris Principles (General Assembly Resolution 48/134 adopted on 20th December, 1993) require a national institution “to publicise human rights and efforts to combat all forms of discrimination by increasing public awareness, especially through information and education and by making use of all press organs.”

### Webinar on "Protection Against Harrassment at Workplace"



The Asian Ombudsman Association (AOA) held a Webinar on “Protection against harassment at the workplace” on March 27, 2024. The Webinar was hosted by the Federal Ombudsman of Pakistan in pursuance of the decision of the 17th Meeting of the AOA General Assembly. The theme of the Webinar is in line with Article 4(2) of the AOA Bye Laws which provide for such activities to facilitate exchange of information and experience among the Ombudsmen in the region. Besides all female staff of the Banking Mohtasib Pakistan, Mr. Shahid Mahmud, Legal Advisor, Mr. Shahan Sheikh, Deputy Director and Rana Irfan Shahid, Assistant Director, Legal also attended the Webinar.

### Awareness Session on “Successful Internship Program Implementation across Ombudsman Offices”



The Forum of Pakistan Ombudsman Secretariat (FPO) arranged a session to share the expertise regarding the internship program at the Head Quarters of Federal Tax Ombudsman Secretariat, Islamabad on September 9, 2024.

The session was conducted by Ms. Tayyaba Munir, Assistant, Federal Tax Ombudsman Secretariat. The awareness session was attended by M/s. Ali Hussain Brohi and Mush-taq Ahmed, Advisors; Ms. Samreen Tanveer, Assistant Director; Mr. Rana Irfan Shahid, Assistant Legal Advisor and Mr. Aamir Ali, Assistant Director, besides Ms. Khushbakt Mohsin, Assistant Investigation Officer.

### Customized Training Programme on “Recent Changes in PPRA Rules/ Procedures and E-Procurement”



Following six officials of the Banking Mohtasib Pakistan attended a three-day Customized Training Programme on “Recent Changes in PPRA Rules/Procedures and E-Procurement” which was held at NIBAF, Karachi from 30th July to 1st August, 2024:

Mr. Shahan Sheikh, Deputy Director – HR/Admin, Ms. Samreen Tanveer, Assistant Director - Coordination, Syed Subhan Ali Rizvi, Assistant Director – IT, Mr. Rana Irfan Shahid, Assistant Legal Advisor, Mr. Muhammad Imran and Mr. Muhammad Nabil from Finance Department.

The Public Procurement Regulatory Authority (PPRA) had recently instructed all Procur-ing Agencies to carry out all their procurement activities of Petty Cash, Request for Quotation (RFQ), Open Competitive Bidding through e-Pak Acquisition & Disposal System (EPAD). This being one of the many steps of the Federal Government towards ‘E-Government’.

### Training on Implementation of Findings and Recommendations by the Ombudsman Office



The following Officials of the Banking Mohtasib Pakistan have attended the training session on Zoom Link on the subject “Implementation of findings and recommendations by the Ombudsman” organized by the Forum of Pakistan Ombudsman Secretariat (FPO) on March 05, 2024 at the Headquarters of Federal Tax Ombudsman Secretariat, Islamabad:

Mr. Muhammad Ikram (Deputy Director), Mr. Rana Irfan Shahid (Assistant Director), Ms. Humaira Hassan (Deputy Assistant Director), Mr. Yaseen Noor Muhammad (Office Assistant) and Syed Mohiuddin (Office Assistant).

### Training on “Ways to Access Information Regarding Maladministration by Public Functionaries”



The Organization of Islamic Cooperation Ombudsman Association (OICOA) arranged a training session (in English language) on August 8, 2024 at its Secretariat situated at the Head Quarters of Federal Tax Ombudsman Secretariat, Islamabad.

The training session was conducted by Mr. Mukhtar Ahmad Ali. He has an M. Phil degree in Development Studies from the Institute of Development Studies (IDS), University of Sussex, UK.

Six Officials including Mr. Mushtaq Ahmed, Advisor, M/s Rahim Rajan and Muhammad Junaid Khan, Consultants; M/s Muhammed Sohail Jangda and Muhammad Ikram, Deputy Directors and Ms. Humaira Hassan, Deputy Assistant Director attended the training session through Zoom.

# Miscellaneous News Items



## Advent of Digital Banking in Pakistan

State Bank of Pakistan (SBP) has issued no objection certificates to the following five (05) applicants for establishing digital banks: (i) Easy Paisa DB (Telenor Pakistan B.V & Ali Pay Holding Ltd.)<sup>1</sup>; (ii) Hugo Bank (Getz Bros & Co., Atlas Consolidated Pte. Ltd. and M & P Pakistan Pvt. Ltd.); (iii) KT Bank (Kuda Technologies Ltd., Fatima Fertilizer Ltd. and City School Pvt. Ltd.); (iv) Mashreq Bank (Mashreq Bank UAE); (v) Raqami (Kuwait Investment Authority through – PKIC and Enertech Holding Co.), according to a press release issued by the State Bank of Pakistan.

In January 2022, SBP introduced a Licensing and Regulatory Framework for Digital Banks in line with international best practices and decided to issue up to five (05) digital banks' licenses. The Framework was the first step towards introducing full-fledged digital banks in Pakistan. The digital banks are expected to provide all the banking services through digital means without any need for their customers to visit the bank branches physically.

In response to SBP's Licensing and Regulatory Framework for digital banks, SBP received twenty (20) applications from a diverse range of interested players such as commercial banks, microfinance banks, electronic money institutions and Fintech firms by March 31, 2022. Further, a number of foreign players including venture capital firms already operating in the digital banking space also expressed their interest to venture into Pakistani market directly or in collaboration with local partners.

The five (05) applicants were selected after a thorough and rigorous assessment process as per the requirements of the Framework. Applicants were assessed on various parameters that included fitness and propriety, experience and financial strength; business plan; implementation plan; funding and capital plan; IT and cybersecurity strategy and outsourcing arrangements, etc. Further, all the applicants were given the opportunity to present their business case to SBP.

Going forward, each of these five (05) applicants will incorporate a public limited company with Securities and Exchange Commission of Pakistan. Afterwards, they will approach SBP for In-Principle Approval for demonstrating operational readiness and for commencement of operations under the pilot phase. Subsequently, they will commercially launch their operations after obtaining SBP's approval.

SBP expects that after commencement of their operations, these digital banks will promote financial inclusion by providing affordable/cost effective digital financial services including credit access to unserved and underserved segments of the society.

(Easy Paisa Bank Limited has started operations as Pakistan's First Digital Bank after it was awarded licence by the State Bank of Pakistan on 28th January, 2025).

## Banking data theft attacks on smart phones tripled in 2024

The number of cyberattacks on smartphones to steal users' banking credentials surged by 196 per cent. The number of Trojan banker attacks on Android smartphones increased from 420,000 in 2023 to 1,242,000 in 2024, Russian cybersecurity and anti-virus firm Kaspersky said in its report.

Trojan banker malware are malicious computer programmes designed to gain access to a person's online banking, e-payment or credit card services by stealing their credentials.

"Cybercriminals are shifting tactics, relying on mass malware distribution to steal banking credentials," said the report titled 'The mobile malware threat landscape in 2024'.

"Over the past year, more than 33.3 million attacks on smartphone users globally, involving various types of malware and unwanted software."

Cybercriminals trick victims into downloading Trojan bankers by spreading links via SMS or messaging apps, attachments in email or other messengers and by directing users to malicious webpages.

In some cases, cybercriminals send messages from a hacked contact's account, making the fraud appear more trustworthy, the report added. To deceive users, attackers often exploit trending news and hype topics to create a sense of urgency and lower victims' guard.

Although Trojan bankers were the fastest-growing type of malware, they rank fourth overall in terms of the share of attacked users at 6pc. The most widespread category remains AdWare, accounting for 57pc of attacked users, followed by general Trojans (25pc) and RiskTools (12pc).

Adware is a type of malware or malicious software that delivers targeted advertisements to users. A Trojan virus disguises itself as legitimate software to trick users into installing it.

Shahzad Shahid, a policy advocate and IT expert, said the alarming rise in mobile banking malware attacks called for a multi-faceted approach to cybersecurity.

He noted that awareness and education were first line of defence. The public must be educated on safe digital practices, such as avoiding suspicious links, using multi-factor authentication, and installing security updates regularly, he said adding that the government should also play a proactive role by integrating cyber security education into academic curricula and ensuring strict regulatory measures for financial institutions and digital service products.

## Response Period by Banks to Complainants' Grievances Reduced by 15 Days

The response period to banking customers' in respect of their complaints with banks has been reduced by 15 days. The banks have now been mandated to respond to the grievances of the complainants within 30 days instead of 45 days as prescribed earlier under the Banking Companies Ordinance, (BCO) 1962.

In case the complainants are not satisfied with the response of the concerned bank, they may approach the Banking Mohtasib Pakistan for redressal of their grievances within a period of 30 days.

According to the amendment made in the Banking Companies Ordinance, 1962 sub-section (2) of section 82D has been substituted as under:

"(2) Prior to making complaint, the complainant shall request the concerned banking company to redress the complainant's grievances and if the banking company either fails to respond or makes a reply which is un-satisfactory to the Complainant within a period of thirty days, the complainant may file a complaint at any time thereafter within a further period of thirty days:

Provided that the Banking Mohtasib may, if satisfied that there were grounds for the delay in filing the complaint, condone the delay and entertain the complaint."

The amendment made in section 82D of the Banking Companies Ordinance, 1962 has been published in the extra ordinary Gazette of Pakistan.



## Adopting Local Payment System by Reducing Dependency on International Payment Platform

In a meeting of Senate Standing Committee on Finance and Revenue held recently, the issue of local currency-based payments and reduction of dependency on International Payment Platform such as Visa and Master Card was discussed. At the meeting, the State Bank of Pakistan officials briefed the Committee on initiatives like RAAST and PAYPAK. The Committee reiterated the importance of increasing the adoption of local payment system to booster economic sovereignty.

On the occasion, the Deputy Governor of the State Bank of Pakistan, Dr. Inayat Hussain in response to a query said that there were 49 million debt cards issued in Pakistan. Out of this, 11.4 million are on PayPak.

The Committee observed that despite the global success of digital payment platforms, including QR Code system, Pakistan remains behind in adopting such technologies.

## Mobile Banking Overtakes ATMs

Mobile banking overtook ATMs by number of transactions to become the single largest digital channel during the first quarter and has only extended its lead ever since, according to the Annual Payment Systems Review (PSR) FY24 of State Bank of Pakistan.

Similarly, for the 12 months, its volumes crossed the billion mark for the first time to reach 1.2 billion while throughput clocked in at Rs46.3 trillion. Even in terms of growth, mobile banking was ahead of others, growing by 95.1 percent by value and 70 percent by volume.

The digital transactions in FY24 continued not only in absolute terms, but also as part of the overall piece. Their share throughput and volumes reached 13.4 percent and volume reached 52.4 percent in the outgoing fiscal year, compared to just 2.6 percent and 16 percent in FY 20.

Internet banking also had a good run processing volumes of 223.2 million worth Rs 23.5 trillion in FY24--- up 30 percent and 44 percent, respectively. As a result, its average transaction surpassed Rs1,050,000 crossing the six-digit threshold for the first time.

On the other side, point of sale dominated with a throughput of Rs 1.5 trillion across 271.4 million transactions. This translates into a yearly increase of 41.2 percent and 33.6 percent, respectively—positioning it as the second fastest growing channel by volumes. Similarly, the number of terminals reached 125,593 across 98,936 merchants. Meanwhile, e-commerce volumes were up by 25.5 percent to 39.9 million, throughput managed to increase by 36.8 percent to Rs 194.4 million.

According to the SBP, 269 million transactions worth Rs211.6 billion were actually processed via accounts and digital wallets.



## Credit Card Debt

The people of Pakistan at large owed Rs2,047,802 million on their credit cards in FY 2024 as compared to Rs 1,665,030 million in FY 2020, showing an increase of Rs 382,772 million during the last four years period. Most worrying factor is that the people who had fallen more than 90 days behind on their payments is also climbing. This may be worrying news for average households as in certain cases reports of harassment by Bank staff are also received. It is however wonderful news for credit card companies and Banks. Credit card issuers make money in a few ways, as one of the most important is payments as financial charges. When a customer doesn't pay off his/her full balance each month, they are levied with financial charges exorbitant rate of interest which is an easy way to bring in more profit.

# Case Studies



## CASE STUDIES

### **Case 1: Issue of unauthorized debit of Rs 7,316,500/- amicably resolved and Complainant gets relief**

The Complainant submitted that an amount of Rs 7,316,500/- was unauthorizedly debited to his account through 34 transactions of internet mobile banking on a single day on 18th January, 2024. He added that his ATM card had already expired and his online transaction limit per day sanctioned by the Bank was upto Rs 500,000/-.

It was observed that Rs 7,316,500/- was withdrawn from the Complainant's account in a single day through IBFT against his online transaction limit of Rs 500,000/- sanctioned for a single day. Further, 34 IBFT transactions were made on a single day which is potentially unusual pattern for any account irrespective of type of account and balance available, but the Bank's 24x7 monitoring system had failed to identify alleged fraudulent activity in the account and no real time restraint was initiated on the Complainant's account to avoid substantial loss despite SBP's clear instructions to deploy real time fraud tools and alert mechanism. Apparently the Bank's system was not proficient with current international security standards, which exposed the Complainant's account to potential fraudsters and resulted in heavy loss to him.

The Bank was made to accept the system glitch / fault at its end and as such credited the amount of Rs 7,316,500/- to the Complainant's account. On satisfactory resolution of the issue, the Complainant showed his satisfaction.

### **Case 2: Complainants get refund of Rs 1,787,500/- deducted from accounts: Issuance of three Insurance Policies without consent**

The Complainants submitted that an amount of Rs 1,787,500/- was deducted from their accounts against insurance policies without their consent / knowledge. They had come to know about issuance of insurance policies and deduction of premium from quarterly statement of their respective accounts. They immediately lodged the complaint with the Bank, but to no avail. Feeling aggrieved, they approached the Office of Banking Mohtasib Pakistan for the redressal of their grievances.

Upon receipt of the complaint, the concerned bank was asked to clarify its position. The Bank in response informed having initiated the process for cancellation of the insurance policies and for full refund of the premium amount with Insurance Company. After continuous follow up, the insurance policies were cancelled and the Bank refunded the total amount of Rs 1,787,500/- (Rs 687,500 + 500,000 + 600,000), to respective accounts of the Complainants. The Complainants confirmed the receipt of funds and expressed their satisfaction over the amicable resolution of their joint complaint.

### **Case 3: Fraudulent e-commerce transactions for an amount of Rs 184,400/- alongwith associated charges of Rs 12,204/-.**

The Complainant submitted that when he went to withdraw cash from ATM, he came to know that an amount of Rs 184,400/- alongwith associated charges of Rs12,204/- was unauthorizedly debited to his account in different dates. He immediately lodged a complaint at the Bank's Helpline and blocked his ATM Card. He added that he did not receive any SMS on his mobile. The Bank, however, did not resolve the issue, as such, he approached this forum for refund of his money.

In response to the query, the Bank informed that the Complainant had disputed 19 online e-commerce transactions amounting to Rs 184,400/- alongwith associated charges of Rs 12,204/- . The transactions executed thereagainst under (3D secured) conducted through Debit Card during the period 13.12.2022 to 18.12.2022. SMS alerts & OTPs against disputed transactions were sent at the Complainant's registered mobile number. The Bank was asked to provide OTP logs (by the Telco) containing nineteen OTPs in de-encrypted form alongwith the text of each message. However, the Bank failed to provide the same, as such it could not be verified by the Bank that all these transactions were 3D secured and OTPs were generated and timely sent to the Complainant. The Bank was then advised to either provide valid proof of having delivered OTPs or revisit the case for an amicable settlement. The case was fixed for hearing as Bank had failed to reach to an amicable settlement with the Complainant. Bank officials again asked for some more time to check as to whether the transactions were 3D secured or not. On their request, one week's time was allowed for the response, but again the Bank failed to rebut the Complainant's stance that he did not receive OTPs against the disputed transactions. In terms of Section 82F(C), BCO, 1962, the Bank could not produce any evidence in support of its stance that the disputed transactions were conducted in 3D secured environment and OTPs were generated / delivered against each disputed transaction.

Prima facie, the disputed e-commerce transactions were non-3-D secured. OTPs were not generated in case of non-3D transactions, therefore, the Bank was non-complaint with Para No. 4.2 (b) of SBP-PSD Circular No. 5 dated 10-06-2016, with regard to implementation of two factor authentication process. Further, the Bank had failed to establish the legitimacy of disputed transactions in terms of Section 41 of the Payment Systems and Electronic Funds Transfer Act, 2007. The weak system's controls & non-implementation of SBP's directives rendered the Bank non-complaint to the SBP's Regulations, which led to financial loss to the Complainant. The complaint therefore, merited consideration and finally the Bank was directed to pay/credit the Complainant's account with Rs 184,400/- alongwith the associated charges of Rs 12,204/- forthwith.

#### **Case 4: Miscalculation by Bank in Conversion / Credit of Export Proceeds**

The Complainant referred to SBP FE Circular # 01 of 2023 to ensure timely repatriation of export proceeds under the Guidelines in Para 6 of Chapter 12 of Foreign Exchange Manual. The Bank misinterpreted the said directives & while converting / crediting export proceeds in the Complainant's account applied Weighted Average Rate (WAR) instead of current market rate.

The Complainant took up the matter with the Bank as it had suffered a loss of Rs 2.8 million on this account. The Bank, however, did not agree with the interpretation of the Complainant, who thus escalated the issue with this Office.

Bank officials in a meeting with BMP officials were explained that their interpretation is not correct whereupon the Bank's representatives expressed desire to negotiate the issue with the Complainant so as to reach an amicable settlement. Their plea was accepted and they were allowed 30 days' time to finalize the matter.

Since no concrete development/progress was seen in the matter, the hearing was held on 09.09.2024 and there the Bank's representatives again showed inclination for amicable settlement and sought 10 more days time, which was agreed by the Complainant.

The Bank subsequently apprised the BMP Office that it had compensated the Complainant with an amount of Rs 2,791,422/-, which had been credited in the Complainant's account on 02.10.2024 and the same was acknowledged by the Complainant.

#### **Case 5: Fraud of Rs 1.295 M through unregistered Mobile Phone Device**

As per Complainant, on 18/4/2024, he received emails from a bank relating to addition of new beneficiaries to his internet banking account and thereafter IBFT transactions aggregating Rs 1,295,000/- were made from his account without his authorization.

On taking up the matter, the Bank submitted that the customer is a regular user of internet banking; even then he clicked on a fraudulent Link received on his mobile phone and shared his account credentials alongwith OTPs, which resulted in financial loss to him.

During the hearing, the Complainant informed that he was accessing his internet banking App through his I-Phone device which is registered with the Bank. On a question, the Bank's representative informed that before execution of disputed transactions, a new mobile device was registered through OTP sent at customer's registered mobile phone. Thereafter, the disputed transactions were conducted through the same mobile device. On enquiry from the Bank official as to whether in terms of SBP's BPRD Circular # 4 dated 14/4/2023, the Bank had conducted NADRA biometric verification of the customer before registering the new mobile device; the response of Bank official was in negative.

Based on available evidences and recorded statements, the Bank was found non-compliant to operational controls as designed by SBP vide their above-mentioned Circular, which ultimately caused financial loss to the Complainant. As such, the Banking Mohtasib Pakistan directed the Bank to pay / credit the Complainant's account with Rs 1,295,000/-. The Bank subsequently complied with the findings of the Banking Mohtasib.

### **Case 6: Fraudulent transactions of Rs 807,321/40 through Internet Banking Funds Transfer**

As per Complainant, he has been maintaining a joint account with his wife at a bank branch in Lahore and his account balance till 28.11.2020 was PKR 807,321/40. In May 2021, when he approached the Bank to check his account balance, he was informed that only PKR 1,421/40 were available in this account.

On taking up the matter, the Bank submitted that 50% transactions were disputed by the Complainant which were executed from his account between 1st January to 24th April, 2021. The Complainant claimed that he neither shared his personal information nor OTPs with anyone nor authorized the above disputed transactions. He claimed that his registered SIM was misplaced/lost, and when he contacted the respective Telco for re-issuance of new SIM, he was informed that his SIM has been transferred to another person.

During the hearing, the Complainant informed that he was unaware of modern day digital banking (ADC- IB/MB/e-commerce) and that he neither had requested for the facility nor conducted any ADC transaction from his account in the past. On a query, the Complainant stated that he had not obtained ATM card and all withdrawals he used to make through cheques only. He added that his mobile SIM was not used for a long period and during this period his SIM number was transferred by the mobile company to another person. In May 2021, when he approached the Bank to inquire the balance in the account, he came to know that his entire amount has been withdrawn through net banking transactions and only PKR 1,421/- was available in the account. On further query, the Bank's representative informed that net banking was activated through his mobile number registered with the Bank. The Bank also admitted that the Complainant had no history of using/availing the ADC/FT facility prior to disputed transactions. The Bank could not produce any evidence that they have educated or divulged to the Complainant in a transparent manner that even if he had not consented or requested for digital/internet/mobile banking, the said facility could have been registered/activated digitally by fraudulent means in case he divulged his personal & account related information to any other person.

Based on available evidences and recorded statements, the Bank was found non-compliant to operational controls as designed by SBP vide their different circulars issued from time to time, which ultimately caused financial loss to the Complainant. As such, the Banking Mohtasib Pakistan directed the Bank to pay / credit the Com-

plainant's account with an amount of PKR 955,000/- along with the Bank charges recovered, if any, and get the refund of the withheld amount of PKR 55,000/- from the member Banks. The Bank subsequently complied with the findings of Banking Mohtasib.

### **Case 7: Dubious Online E-commerce transactions of Rs 166,544/60**

The Complainant has submitted that he is maintaining a bank account with a bank branch at Lahore. In March 2024, he just randomly checked his bank account statement and found 38 online dubious transaction(s) amounting to Rs 166,544/60 from 2nd October, 2023 to 15th March, 2024". Further, neither OTPs against disputed transactions nor any e-mail alerts were received from the Bank. Subsequently, he called the Bank's Helpline and his card as well as App were blocked.

In response, the Bank submitted that on March 26, 2024 the customer contacted the Bank and informed that 21 disputed E-commerce transactions amounting to PKR 166,699.74/-, under 3D-Secure mode were performed via debit card from December 04, 2023 to March 24, 2024. Since the disputed transactions were executed on 3D Secure mode after OTP authentication, as per Master Visa rule the Bank was unable to raise charge back against 3D secured transactions.

During the hearing, the Complainant stated that he was totally unaware of the fraudulent transactions conducted in his account since he neither received any message of fraudulent transactions nor an OTP for validation of such transactions either through SMS or email. On a query, the Complainant stated that during the period when transactions were conducted through debit card on POS, SMS alerts were not received. The Complainant reiterated that he constantly asked the Bank for any legitimate proof to show that the transactions were conducted by him and that the Bank had provided instant information on his cell number, but unfortunately, he did not get any response; rather, he was communicated that his complaint has been closed and marked as his liability.

Later, the Bank was asked to provide a detailed investigation report in compliance with SBP's BPRD Circular 4/2023; however, the Bank, in its response, stated that since the disputed e-commerce transactions were 3D secured, as such, the Bank management had decided not to hold the investigation with the consideration that no fraud was committed. The Bank was advised that regardless of the Bank's contention, it was binding on the part of the Bank to hold a proper inquiry to arrive at the root cause of the activities reported to the Bank by its customer against alleged digital banking fraud. The Bank's stance to avoid investigation of the complaint was tantamount to avoiding compliance of SBP Rules and Regulations as envisaged in BPRD Circular # 4 of 2023 dated 14.04.2023. It was observed from the SMS log submitted by the Bank that some disputed transactions were conducted, but no SMS was generated/sent to the Complainant. Hence, the Complainant's stance that he had not received any SMS alerts and OTPs against the disputed transactions appeared to be justified.

Based on the information and documents submitted and arguments put forth by the parties and keeping in view the non-compliance of provisions of Payment Systems and Electronic Fund Transfer Act, 2007 and Rules & Regulations of SBP, the mal-administration & mal-practice on the part of the Bank was established. As such, the Banking Mohtasib Pakistan directed the Bank to pay / credit the Complainant's account with a sum of PKR 166,699.74. The Bank subsequently complied with the findings of Banking Mohtasib.

### **Case 8: Bank complied with the findings of Banking Mohtasib**

The Complainant submitted that he has been maintaining an account with a bank's branch in Havelian. On 21st September, 2022, he received a call from a number similar to the Bank's Helpline and the caller portrayed himself as the Bank's representative. The caller knew his CNIC as well as account number. Believing it to be a genuine call from the Bank, the Complainant shared his OTP with the caller. Resultantly, his account was debited with an aggregate amount of Rs 3,134,808/- through 25 disputed transactions on account of Bill Top-up, Internal Funds Transfer, IBFT, Payment to FBR, FESCO Bill Payment and MEPCO Bill Payment.

On taking up the matter, the Bank submitted to the Banking Mohtasib that the transactions disputed by the Complainant could not be termed as fraudulent on the part of the Bank as it was the mandatory responsibility of the customer to ensure that account credentials/ Card/ ATM PIN / Mobile SIM should not be shared with anyone. An amount of Rs 996,000/- was transferred to different accounts of the Bank. Further, a sum of Rs 747,000/- was transferred to different accounts of the beneficiary Bank through three IBFT transactions of Rs 249,000/- each on 21st September, 2022 which was timely blocked and the amount withheld with them. Remaining amount of Rs 1,391,808/- was used for different bills payment i.e. Bill Top-up, Payment to FBR, FESCO and MEPCO.

During the hearing, the Complainant stated that he was not aware of present days' technology-based banking products and he had neither requested/solicited any facilities under the Bank's technology-based products – ADCs nor had ever conducted any Internet / Mobile banking (IB/MB) / e-commerce transactions in the past. He further agitated that how his account was operated without his authority when the cheque book and the ATM Debit Card were in his safe custody.

The Bank informed that the customer's Internet Banking ID was activated on 21st September, 2022 and on the same day, the disputed transactions were conducted. Replying to a question, the Bank's representative stated that the Complainant's per day ADC limit (Internal Fund Transfers, IBFT and e-commerce etc.) was Rs 2.750 million while for Bill Payment was unlimited. It was pointed out that user ID for digital account cannot be created unless ADC channels are active. In the instant case, the Complainant had not given any consent; in terms of SBP-PSD directives issued vide Circular No. 3/2018 for utilization of ADC/FT channel (which Bank has admitted), but

despite clear instructions the Bank had activated ADC channel without his consent. The representative of the Bank could not clarify the Bank's position and satisfy this forum on such issues.

The Bank also failed to establish the legitimacy of disputed transactions in terms of Section 41 of Payment System and Electronic Fund Transfer Act, 2007. Therefore, based on the information and documents submitted and arguments put forth by the parties and keeping in view the non-compliance of provisions of Payment Systems and Electronic Fund Transfer Act, 2007 and Rules & Regulations of SBP, the mal-administration & mal-practice on the part of the Bank was established.

The Bank was found non-compliant to operational controls as designed by SBP vide their above-mentioned Circular, which ultimately caused financial loss to the Complainant. As such, the Banking Mohtasib Pakistan directed the Bank to pay/credit the Complainant's account with a sum of PKR.3,134,208/- along with associated charges of PKR.600/- and profit during the period till the settlement of the issue forthwith and report compliance. The Bank was advised to recover the sum of Rs 747,000/- from Acquirer Bank after completion of formalities as per industry practice in vogue. The Bank subsequently complied with the findings of the Banking Mohtasib.

### **Case 9: Embezzlement by the Bank Staff**

The Complainant submitted that she is maintaining account with the Bank's branch at Rawalpindi. In 2016, she sold a house in Karachi for Rs 10,500,000 and deposited the amount in her account. The Relationship Manager of the Branch promised her lucrative profit for investing her funds in Bank's stocks and a life insurance Company. Accordingly, an amount of Rs 6.6 million was given by her to the Relationship Manager for investment in the Bank's Islamic Stock Fund, Rs 1.5 million in the insurance company and Rs 388,000/- in cash for other investment. In the year 2018, the Relationship Manager asked her to avail gold pledged loan and she deposited 25 tolas Gold and Diamond set against which she was provided loan amounting to Rs 1 million which was again invested in Bank's Islamic Stock Fund. She continuously received profit on stocks amount in her account till 2020. During the period she was provided fake and fabricated Statement of Account. Then she came to know that the Relationship Manager joined another Bank as Branch Manager. He asked her to shift her investment to his branch as Term Deposit. Later upon inquiry from the Bank regarding Term deposit, she was astonished to know that no such amount was available in her account. She lodged a complaint with the Bank. The Relationship Manager and his staff member were found guilty of unlawful and illegal transactions, but the Bank did not provide her any relief. As such, she lodged an FIR with reference to her investments in both the Banks and escalated complaint with the Banking Mohtasib praying for direction to refund her huge disputed amount totaling Rupees 1 Crore 5 Lakh.

The Legal Counsel of the Bank at the Hearing made preliminary objection by referring to the judgement of Lahore High Court reported in PLD 2018 Lahore 322. It

is stated that the judgment has not barred the jurisdiction of the Banking Mohtasib. The reading of the judgement clearly gives its directions that Banking Mohtasib is not a Court or Tribunal under any High Court or Supreme Court, therefore Ombudsman cannot exercise judicial power, hence cannot made binding orders. Further, the Honorable Lahore High Court in that case allowed the Banking Mohtasib to entertain the complaints, in its Para 38. Whereas on same issue, two other judgements are on the same subject have given their own findings and accepted the jurisdiction of Banking Mohtasib in a case titled HBL vs FOP etc. reported in 2018 CLD 1152 & MCB vs FOP etc. reported in PLD 2019 Sindh Karachi 624. All these judgements of Honorable High Courts are clubbed in appeals pending before the Honorable Supreme Court. The foregoing legal position clarify that these legal objections have no sound reasoning and raised just to delay the proceedings to subvert the dispensation of relief to the poor female Complainant. The Bank has not denied that the relationship manager was not in service of the Bank when these fraudulent transactions were conducted and also not denied that he was arrested by FIA and a criminal case is pending before Special Judge (Banks offences) for the fraudulent activity committed by him in the Bank and his bail application had been rejected by Hon'ble Courts.

The facts and law as discussed in above paras and the sequence of fraudulent transactions in the account of the Complainant, it is clear that this is a case of vicarious liabilities of the Bank because the Relationship Manager and his cronies during this period were in the employment of the Bank when fraud was committed with the Complainant. The Bank has not followed Banking Laws, Practice and best norm of Banking in vogue. The Honorable Sindh High Court, Karachi in this regard in a case titled Mr. Muhammad Mahmood Qureshi Vs Ms. UBL and 4 others reported in PLD 1994 Karachi 323 observed at Page 339 regarding the vicarious liability of the Bank when its employee was in active service of the employer (Bank).

"A person working as manager of a branch is supposed to be incharge of that branch sitting above all others in the branch and, therefore, it would be reasonable for a customer to assume that other members of the staff derive authority through him in his capacity as the head of the branch. It would be incomprehensible for a layman that while a clerk of the branch was authorized to accept money the manager was not. For a layman handing over the cash deposit to the manager of a branch would appear much safer and desirable than to a clerk."

Further Honorable Court at Page 340 observed that:

" If that amount was misappropriated by the manager or for that matter by any other officer of the bank the bank would still be liable to make good the loss in so far as the customer is concerned. It is entirely the concern of the bank to have honest officers and staff to eliminate chances of dishonesty and misappropriation. As such, I am unable to agree with the defendant's counsel that paying-in-slips having not been signed by the cashier and the alleged authorized officer would not make the bank liable for the amount."

Having regard to the above case laws and discussions, the objection of learned counsel had no consideration is therefore turned down. Looking at the facts of the case and as admitted by Bank that the fraud was committed by Branch Manager while in service, therefore, it is responsibility of the Bank to honour the commitment made by their respective employees who had mis-appropriated the amount while acting as officials of Bank.

The Bank was provided fair opportunity to rebut the claim of the Complainant with any cogent substantive reasonable relevant evidence, but the Bank miserably failed to defend its position on merit and on law and rebut the claim of the Complainant filed before this forum on oath. Thus, maladministration and malpractice are proved on the part of the Bank and is liable to compensate for the loss sustained by the Complainant for the acts committed by the then manager. Rs 1,300,000/- was returned to the Complainant and the Bank is liable to compensate the Complainant as per the findings hereunder. As no disputed transaction was executed through the Banking channel of another Bank, thus absolved from any liability.

Based on available evidences and observations made, the Banking Mohtasib Pakistan accepted the complaint and directed the Bank to make the payment of PKR 9,200,000/- along with profit till realization, to Complainant and report compliance. The Bank subsequently filed a representation with the office of Hon'ble President of Islamic Republic of Pakistan against the said findings of Banking Mohtasib Pakistan but the same was turned down and the findings of the Banking of Banking Mohtasib Pakistan was upheld by the Office of the Hon'ble President of Islamic Republic of Pakistan.

#### **Case 10: Refund of Service charges of Rs 22,329,838/- deducted from "students' Fee Collection Account".**

A University through its Treasurer filed a complaint that as per agreement between the Bank and the University dated the 28th June, 2008, the Bank had to recover Rs 35/- directly from each depositor / student, which was to cover all charges, including postal / courier / Bank etc. and no collection and remittance charges whatsoever was to be charged by the Bank from the University Account. The said agreement expired on 27th June, 2011. After the expiry of the agreement, the Bank was requested several times, but no new agreement was concluded. However, with effect from April 2013, the Bank unauthorizedly started deducting Commission and Federal Excise Duty (FED) against each fee deposit transaction from the University Account. The Bank continued deducting such charges till 17th October, 2016. Total deducted amount aggregated to Rs 22,329,838/- i.e., Rs 19,249,860/- as commission and Rs 3,079,978/- as FED.

On taking up the matter, the Bank stated that the deduction of charges had been made in terms of CMD contract duly agreed & signed by the University official. The Bank and the University had signed a collection proposal in 2011 and on the basis of

the proposal, the Bank opened a non-chequing collection account. From the year 2012 to 2017, the Bank provided different collection services i.e. over the branch counter fee collection from students, submission of reconciled reports and MIS. The Bank charged the University @ PKR 35 per transaction on the services rendered which was clearly mentioned in the University proposal signed by the University official.

In order to conclude the case, five hearings were held. During the hearings, to a query whether any notice was served to the customer, before starting recovery of charges, the Bank's representative maintained silence.

It was observed that after the expiry of contract dated 28th June, 2008, one document on a plain paper was prepared by the Bank. The document was undated with no expiry date mentioned thereon and also did not bear any witness. Lacking date of issuance, date of expiry and witnesses, makes the document "Voidable". Moreover, in terms of Section 17 of the Registration Act, 1908, a plain reading of the Bank's proposal, also lacks attributes of a valid agreement. The Bank failed to produce a valid agreement, as such, all charges related to collection of fee from students, etc., debited to University's account after the expiry of Agreement dated 28th June, 2008, were held as unjustified. Recovery of said charges, in absence of a valid agreement also rendered the Bank having superseded its own "Schedule of Charges" of the matching period.

It was also observed that in certain cases, the Bank had also recovered charges directly from students between the period from 1st August, 2011 to 15th September, 2014. The recovery of charges from the students by the Bank was in violation of the regulations in terms of SBP's BPRD Circular No. 6 of 2007.

Based on available evidences and recorded statements, recovery of charges amounting to Rs 22,329,838/- by the Bank from Student's Fee Collection Account of the University, was found illegal. As such, the Bank was directed to reverse the amount forthwith. The Bank preferred to file a representation before the Hon'ble President of Islamic Republic of Pakistan against the findings of Banking Mohtasib. The President's Office after giving a hearing to the Bank and the University officials upheld the findings of Banking Mohtasib Pakistan.



# **Public Acknowledgement of Our Services**

Dear Mr. [REDACTED]

I hope this email finds you well.

I would like to extend my sincere gratitude for your prompt and valuable assistance in addressing the matter of opening the "Mentally Disordered Person Account" for Mst. [REDACTED]. Your efforts, along with the Bank's cooperation, have been instrumental in resolving this issue efficiently.

I confirm that the matter has been successfully resolved, and the account has been opened at [REDACTED]. We greatly appreciate the timely communication and follow-up from both your office and the Bank's representative.

Once again, thank you for your support and for taking the time to assist us with this matter.

Regards,

Assistant Director  
[REDACTED]  
[REDACTED]

Dear Concerned,  
Asslamualekum .

I hope this email finds you well.

I would like to extend my heartfelt thanks for the timely and effective resolution of the transaction issue I encountered with [REDACTED] Bank. I greatly appreciate the assistance provided by your office, and I would especially like to commend Mr. [REDACTED] for his outstanding coordination and efforts throughout the process.

[REDACTED] professionalism, prompt responses, and dedication to ensuring the matter was resolved were truly commendable. His consistent follow-ups and proactive approach not only gave me confidence but also exemplified the high standards of service that I now associate with your esteemed office.

I am grateful for the support provided, and I sincerely appreciate the transparency and communication maintained throughout the process. Thanks to your efforts, I can now rest assured that the matter has been thoroughly addressed. Once again, thank you for your invaluable help and the outstanding service rendered by [REDACTED].

Regards  
[REDACTED]

۱۔ بخدمت جناب بینکنگ محاسب پاکستان کراچی  
۴۹ عنوان :- شہادت برائے [REDACTED]

جناب عالی

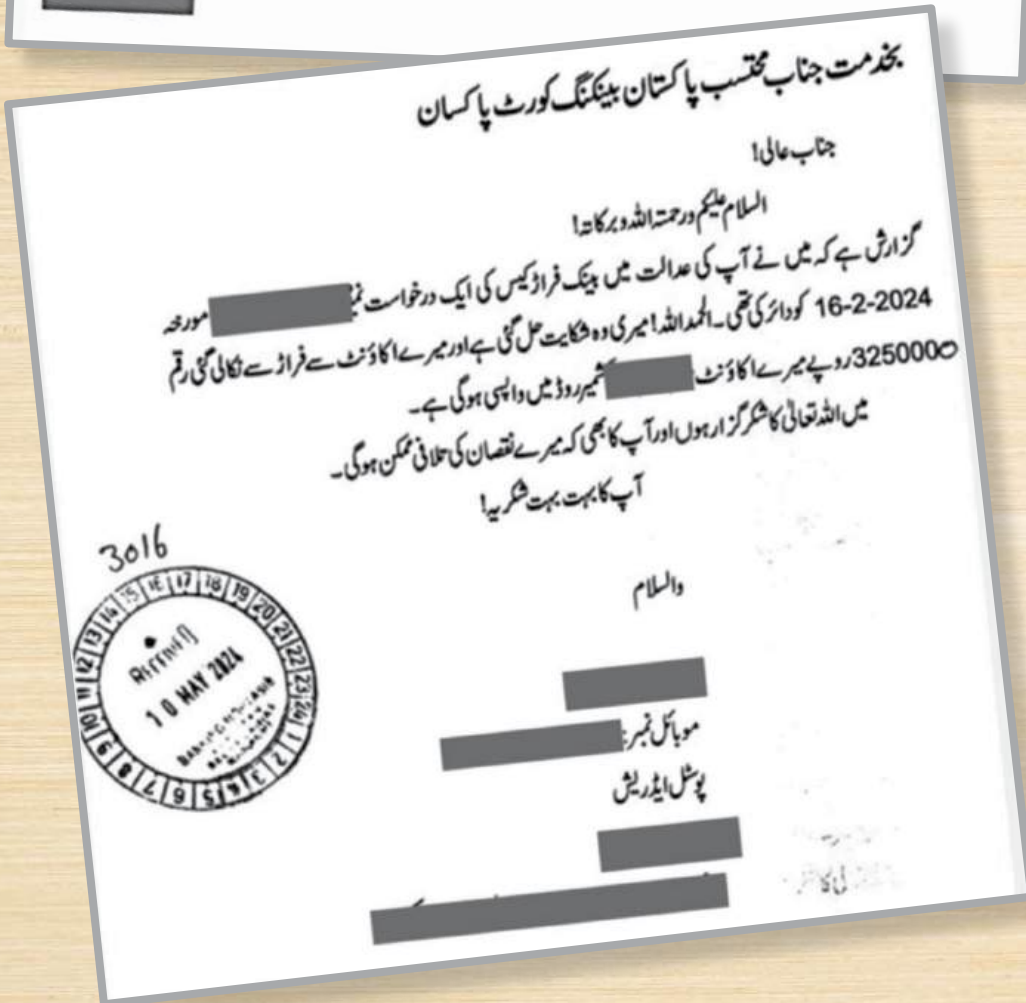
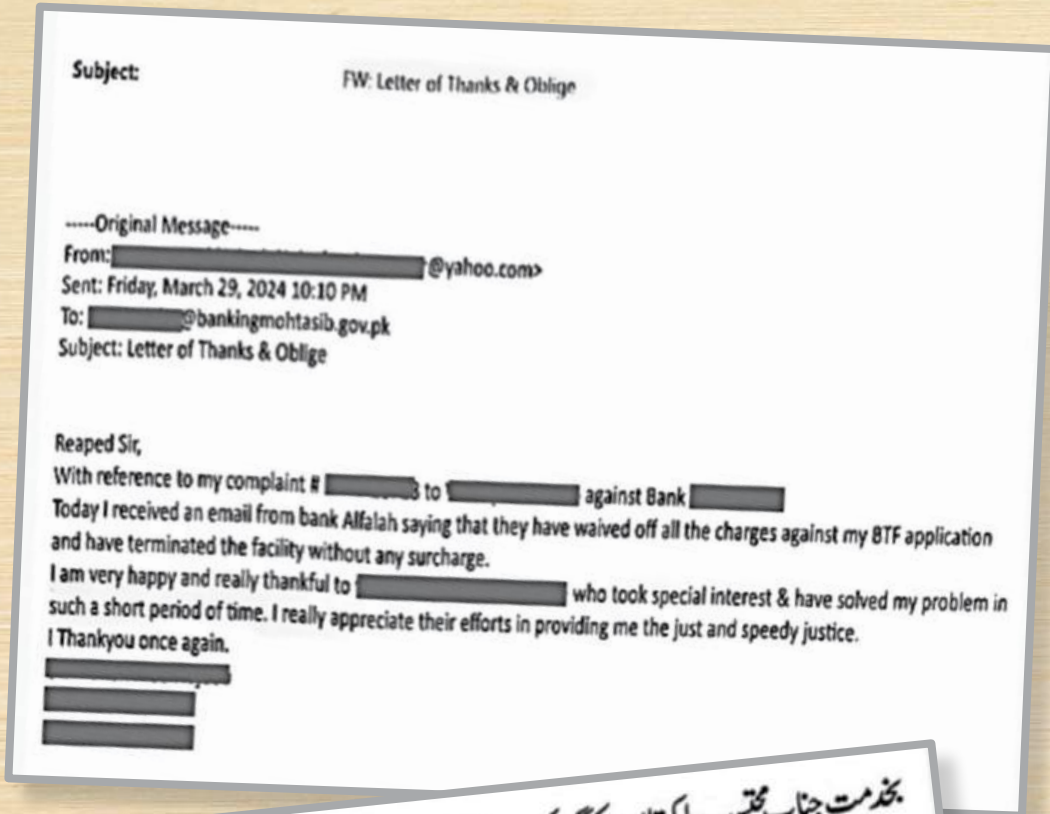


گزارش ہے کہ فروہی نے اپنا ایس بینکنگ  
پاکستان کی طرف بھیجا تھا جس پر بینکنگ محاسب پاکستان  
کے سامنے ۶ مئی ۲۰۲۴ کو انٹرنل کیڈیشن ہو ا۔ بینکنگ  
محاسب صاحب ۱۵ جون ۲۰۲۴ کو فیملہ سنایا جس پر  
فراڈ کے ذریعے نکالے گئے ۱۸۴۸۵۵۰ اور اس کے ساتھ متعلقہ  
چار جزی ۱۵۳۵۴۰۰۰ پر میرے اکاؤنٹ [REDACTED]  
[REDACTED] برانچ میں جمع کرانے کے احکامات  
صادر فرمائے جس کیلئے میں ذاتی طور پر بینکنگ محاسب  
پاکستان کا بے حد ممنون اور مشکور ہو جنہوں نے مجھے سنا  
اور میرے حق میں فیملہ سنایا۔ [REDACTED] کو کٹہ  
برانچ میں ۳۰ جولائی ۲۰۲۴ کو میرے اکاؤنٹ میں  
فراڈ کا دعویٰ [REDACTED] جمع کروائے۔ ایک دفعہ پر میں بینکنگ  
محاسب پاکستان کا شکریہ ادا کرتا ہوں۔

7/8/2024

07/08/2024

کوٹہ







#### Feedback

I am impressed with the prompt resolution of my complaint within the stipulated timeframe. The efficiency and effectiveness of your complaint handling process are truly commendable.

21-Dec-2024

Satisfied: Yes

#### Feedback

Thanks citizen portal Pakistan and banking mohtasib Pakistan as the debit card successfully delivered to me

Thanks

10-Dec-2024

Satisfied: Yes

#### Feedback

Thanks for following my complaint my problem has been solved with positive manners

22-Oct-2024

Satisfied: Yes

#### Feedback

میرا کام کروانے کا بہت بہت شکریہ

02-Dec-2024

Satisfied: Yes

#### Feedback

My Issue Has Been Resolved And Thanks For The Quick Support And Assistance

18-Oct-2024

Satisfied: Yes

#### Feedback

I'm speechless & don't have words but the Issue that has been pending for long time has been resolved in just 10 days. Thanks For having This Opportunity to citizens & Thanks Again To the Authorities For Resolving our Issue. Jazakallah ♥

06-Mar-2024

Satisfied: Yes



### Feedback

Thanks to citizen portal for my amount back. Thanks for not letting me down

05-Oct-2024

Satisfied: Yes

### Feedback

My issue resolved  
I proud of you PMDU portal officials

18-Sep-2024

Satisfied: Yes

### Feedback

Had a problem receiving refund for more than a month hence complained here and received refund in a short time. Appreciated.

23-Sep-2024

Satisfied: Yes

### Feedback

I really appreciate you people for helping and supporting me. Thanks a lot

28-Sep-2024

Satisfied: Yes

### Feedback

Phly bank jata rha phr mery dost ne ap ka btya or ap ne wo msia bht jldi hal kr diya

31-Aug-2024

Satisfied: Yes

### Feedback

مروض خدمت یوں کہ آپ صاحبان کی انتہک کوششوں سے مجھے تھوڑا کم سب سے لیکن اپنی رقم مل چکی ہے۔ اللہ آپ لوگوں کو جزائے  
خیر عطا فرمائے آمین۔

28-May-2024

Satisfied: Yes



#### Feedback

السلام علیکم ورحمتہ اللہ وبرکاتہ جناب وزیراعظم اعظم اسلامی جمہوریہ پاکستان میں آپ کا شکر گزار ہوں کہ آپ نے میرا مسئلہ حل کیا

28-Sep-2024

Satisfied: Yes

#### Feedback

Bundle of Thanks. Really I am grateful of Pakistan Govt & Banking Mohtasib

04-Sep-2024

Satisfied: Yes

#### Feedback

Thank you for mustahab banking and also thank you for Pakistan citizen portal to provide us fast free services and sold our problems thanks thanks with our good wishes Pakistan zindabad

15-Sep-2024

Satisfied: Yes

#### Feedback

Allah tala k fazal sa mera account opn hgya r mana paisa bhe withdraw krva liya hain r Allah na i logon ko zarya bnya thank u

11-Aug-2024

Satisfied: Yes

#### Feedback

Excellent performance. My complaint has been resolved. Thanku very much. I am very thankful and performance is appreciated.

21-Aug-2024

Satisfied: Yes

**Feedback**

Excellent, i got releif, they took action and respond us too. Our problem resolved professionally.  
Thanks

11-Nov-2024

**Satisfied: Yes**

**Feedback**

I like the quick response from citizen portal

31-Jul-2024

**Satisfied: Yes**

**Feedback**

Thank u very much sir  
Ap logon ki waja sy ye Bank waly seedhy hain wrna poro qom ko ye loot ker khajain

30-Jul-2024

**Satisfied: Yes**

**Feedback**

Thank u so much to those who helped me. JazakAllah, mola Sada Salamat rakhen  
ALHAMDULILLAH mery pesy return ho gay

02-Aug-2024

**Satisfied: Yes**



#### Feedback

I am writing to thank you for promptly resolving my issue with the pending amount from my bank. I am pleased to inform you that I have received the amount from the concerned bank. Your team's professionalism and timely response are greatly appreciated. Thank you for your excellent service.

10-Jul-2024

**Satisfied:** Yes

#### Feedback

Special thanks to Banking Mohtasib who has taken action and because of this timely dispute has been resolved.

25-Jun-2024

**Satisfied:** Yes

#### Feedback

Complain resolved through direct cooperation of bank mohtasib

26-Jun-2024

**Satisfied:** Yes

#### Feedback

I have received card after more than 2 weeks. Issue was resolved due to involvement of Banking Mohtasib otherwise bank did not co-operate and demonstrated unprofessionalism and laziness.

25-Jun-2024

**Satisfied:** Yes

**Feedback**

got money back, I can't believe this worked. impressed.

12-Dec-2024

**Satisfied:** Yes

**Feedback**

Thanks to all agencies SBP, Bank Mohtesb and Citizen portal which helped to get resolved matters.

22-May-2024

**Satisfied:** Yes

**Feedback**

Very good . Useful and timely responded. Very effective forum

04-Apr-2024

**Satisfied:** Yes

**Feedback**

I am thankful to PM portal team all those who helped me for cancellation of my policy to get my payment back in account. I am very satisfied with their cooperation.

13-Mar-2024

**Satisfied:** Yes



# **Print Media on the Activities of Banking Mohtasib Office**

## PRESS CLIPPINGS



## PRESS CLIPPINGS



## کیس نمبر 10: طلباء کی فیس وصولی کے اکاؤنٹ سے سروس چارجز کی مد میں وصول کئے/22,329,838 روپے کی واپس ادائیگی

ایک یونیورسٹی نے اپنے خزانچی کے توسط سے ایک شکایت دائر کی کہ بینک اور یونیورسٹی کے مابین 28 جون، 2008ء کو ہونے والے ایک معاہدے کے تحت طے پایا کہ بینک ڈاک/کورئیر/بینک اخراجات کی مد میں براہ راست ہر جمع کنندہ/طالب علم سے -/35 روپے وصول کرے گا اور بینک ان کے علاوہ فیس وصولی اور ریمیننس وغیرہ کی مد میں یونیورسٹی سے کوئی چارج وصول نہیں کرے گا۔ یونیورسٹی اور بینک کے مابین یہ معاہدہ 27 جون، 2011ء کو ختم ہو گیا۔ اس معاہدے کے اختتام پر بینک سے متعدد بار درخواست کے باوجود نیا معاہدہ نہیں طے پاسکا۔ تاہم، اپریل 2013 سے بینک نے کسی اجازت کے بغیر جمع کرائی گئی ہر فیس کی ٹرانزیکشن پر یونیورسٹی کے اکاؤنٹ سے کمیشن اور فیڈرل ایکسائز ڈیوٹی (FED) کی مد میں رقم منہا کرنا شروع کر دی۔ بینک 17 اکتوبر، 2016 تک یہ کٹوتی کرتا رہا۔ کمیشن کے طور پر -/19,249,860 روپے اور FED کی مد میں -/3,079,978 روپے کی کٹوتی سے مجموعی طور پر -/22,329,838 روپے کی رقم منہا کی گئی۔

معاملے کی جان پڑتال پر بینک نے بتایا کہ اخراجات کی کٹوتی یونیورسٹی حکام کی رضامندی اور ان کے دستخط سے کئے گئے ایک CMD معاہدے کے تحت کی گئی ہے۔ بینک اور یونیورسٹی نے 2011ء میں فیس وصولی کے لئے ایک معاہدے پر دستخط کئے اور اس معاہدے کی بنیاد پر بینک نے ایک غیر چیک (non-chequing) وصولی اکاؤنٹ کھولا۔ 2012 سے 2017ء تک برانچ کے کاؤنٹر پر فیس کی وصولی، فیس وصولی کی رپورٹس اور MIS جمع کرانے جیسے مختلف خدمات فراہم کیں۔ بینک نے فراہم کردہ خدمات پر فی ٹرانزیکشن 35 روپے کی شرح سے یونیورسٹی سے وصولی کی جیسا کہ یونیورسٹی کے معاہدے میں، جس پر یونیورسٹی حکام کے دستخط بھی موجود ہیں، واضح طور پر درج تھا۔

اس مقدمے کو نمٹانے کی غرض سے پانچ سماعتیں ہوئیں۔ ان سماعتوں کے دوران، ایک سوال کے جواب میں کہ کیا چارجز کی وصولی شروع کرنے سے قبل کسٹمر کو کوئی نوٹس دیا گیا تھا، بینک کے نمائندے کی جانب سے خاموشی اختیار کی گئی۔

مشاہدے میں یہ بات آئی کہ 28 جون، 2008ء کے معاہدے کی مدت پوری ہونے کے بعد، بینک کی جانب سے ایک سادہ کاغذ پر ایک دستاویز تیار کی گئی۔ بغیر کسی تاریخ کی اس دستاویز پر نہ تو کوئی اختتامی تاریخ درج تھی اور نہ ہی اس کے کوئی گواہان درج تھے۔ تاریخ اجراء، تاریخ اختتام اور گواہان کی عدم موجودگی اس دستاویز کو کالعدم قرار دیتی ہے۔ مزید برآں، بینک کی تیار کردہ دستاویز کے سرسری جائزہ سے معلوم ہوتا ہے کہ اس دستاویز میں رجسٹریشن ایکٹ، 1908ء کی دفعہ 17 کے تحت ضابطے کے مطابق درست معاہدے کی خصوصیات کا فقدان ہے۔ بینک کوئی درست دستاویز پیش کرنے میں ناکام رہا اور اس طرح طلباء سے فیس وصولی سے متعلق تمام چارجز جو معاہدے کے اختتام کے بعد یونیورسٹی کے اکاؤنٹ سے منہا کئے گئے، غیر منصفانہ قرار پائے۔ کسی ضابطے کے مطابق معاہدے کی غیر موجودگی میں ان چارجز کی وصولی ظاہر کرتی ہے کہ بینک نے اس عرصے کے لئے خود اپنے ہی شیڈول آف چارجز سے تجاوز کیا ہے۔

یہ بھی دیکھا گیا کہ بینک نے یکم اگست، 2011ء سے 15 ستمبر، 2014ء کے دوران کئی کمیسرز میں طلباء سے براہ راست بھی چارجز وصول کئے۔ بینک کی جانب سے طلباء سے چارجز کی وصولی، اسٹیٹ بینک آف پاکستان کے بی پی آر ڈی سرکلر نمبر 2007/6 میں بیان کردہ ضوابط کی خلاف ورزی تھی۔

دستیاب شہادتوں اور ریکارڈز کئے گئے بیانات کی بنیاد پر، بینک کی جانب سے یونیورسٹی کے طلباء کی فیس وصولی کے اکاؤنٹ سے -/22,329,838 روپے کے چارجز کی وصولی غیر قانونی پائی گئی۔ بینک کو ہدایت کی گئی کہ وہ یہ رقم فوری طور پر واپس کرے۔ بینک نے بینکنگ محتسب پاکستان کے فیصلے کے خلاف عزت مآب، صدر، اسلامی جمہوریہ پاکستان کے دفتر میں اپیل دائر کر دی۔ صدر پاکستان کے دفتر نے بینک اور یونیورسٹی کے افسران کو سننے کے بعد بینکنگ محتسب پاکستان کے فیصلے کو برقرار رکھا۔

سلسلے میں معزز عدالت عالیہ سندھ، کراچی نے محمد محمود قریشی بنام UBL اور دیگر چار PLD 1994 کراچی 323 میں اپنے فیصلے کے صفحہ 339 پر بینک ملازم کی دوران ملازمت کسی کاروائی کے لئے بینک کی قانونی ذمہ داری (vicarious liability) کے بارے میں تشریحات کی ہیں۔

"برانچ مینیجر کے طور پر کام کرنے والا شخص اس برانچ کا انچارج تصور کیا جائے گا جو برانچ کے تمام عملے سے اوپر کے عہدے پر ہے اس لئے کسی بھی کسٹمر کے لئے یہ تصور کرنا کہ بالکل بجا ہو گا کہ برانچ عملے کے دیگر افراد کو حاصل اختیارات، برانچ مینیجر کے عہدے پر بیٹھے اس شخص کے توسط سے ملتے ہیں۔ ایک عام فرد کے لئے یہ بات قطعی طور پر ناقابل فہم ہوگی کہ برانچ کے ایک کلرک کو تو رقم وصول کرنے کا اختیار حاصل ہو، لیکن برانچ مینیجر کو یہ اختیار حاصل نہ ہو۔ ایک عام فرد اپنی رقم کسی کلرک کے حوالے کرنے کے مقابلے میں برانچ مینیجر کے حوالے کرنا زیادہ محفوظ تصور کرے گا۔"

مزید برآں، معزز عدالت نے صفحہ 340 پر لکھا کہ: "اگر رقوم میں خُرد بُرد مینیجر یا اس بینک کے کسی اور افسر نے کی ہے تو بھی متعلقہ کھاتے دار کے نقصان کو پورا کرنے کا ذمہ دار ہوگا۔ یہ مکمل طور پر بینک کی ذمہ داری ہے کہ وہ بددیانتی اور بدعنوانی کو ختم کرنے کے لئے دیانت دار افسران اور عملہ رکھے۔ اس طرح، میں وکیل صفائی کے اس استدلال سے اتفاق نہیں کرتا کہ رقم جمع کرانے کی سلیپ (paying-in-slips) پر کیسٹیر کے دستخط نہیں تھے اس لئے اس رقم کے لئے مبینہ مجاز افسر کے عمل کا بینک کو ذمہ دار قرار نہیں دیا جاسکتا۔" درج بالا مقدمے میں بیان کردہ قوانین اور بحث کی روشنی میں معزز وکیل صفائی کے اعتراض کو مسترد کیا جاتا ہے۔ مقدمے کے حقائق کو مد نظر رکھتے ہوئے اور بینک کی جانب سے اس بات کو تسلیم کرنے پر کہ برانچ مینیجر کی جانب سے دھوکہ دہی کی واردات اس دوران ہوئی جب وہ بینک کا ملازم تھا اس لئے یہ بینک کی ذمہ داری ہے کہ وہ بینک کی ملازمت کے دوران بدعنوانی کرنے والے اپنے متعلقہ ملازمین کی جانب سے کئے گئے وعدوں کو پورا کرے۔

بینک کو ٹھوس اور معقول شہادتوں کے ذریعے شکایت کنندہ کے دعوے کو رد کرنے کے لئے پورا موقع فراہم کیا گیا۔ تاہم بینک، اس فورم کے روبرو قانونی طور پر اپنے موقف کے دفاع کرنے اور شکایت کنندہ کے دعوے کو رد کرنے میں مکمل طور پر ناکام رہا۔ اس طرح بینک کی جانب سے بدانتظامی اور بدعنوانی ثابت ہوتی ہے اور بینک اس کا ذمہ دار ہے کہ وہ اپنے اس وقت کے مینیجر کے ہاتھوں شکایت کنندہ کو پہنچنے والے نقصان کا ازالہ کرے۔ شکایت کنندہ کو -/1,300,000 روپے واپس ادا کردئے گئے اور بینک، اس سلسلے میں شکایت کنندہ کے نقصان کا ازالہ کا ذمہ دار ہوگا۔ چونکہ کوئی تنازعہ ٹرانزیکشن دوسرے بینک کے بینکنگ چینل سے نہیں ہوئی اس لئے اس بینک کو کسی بھی ذمہ داری سے بری کر دیا گیا۔

دستیاب شہادتوں/ثبوتوں کی بنیاد پر بینکنگ محتسب پاکستان نے شکایت کنندہ کے دعویٰ کو تسلیم کرتے ہوئے بینک کو ہدایت کی کہ شکایات کنندہ کو -/9,200,000 روپے اور اس رقم کی منتقلی تک اس پر منافع کی رقم ادا کرے اور اس حکم پر عمل درآمد کی رپورٹ پیش کرے۔ بعد ازاں، بینک نے بینکنگ محتسب پاکستان کے فیصلے کے خلاف عزت مآب، صدر، اسلامی جمہوریہ پاکستان کے دفتر میں اپیل دائر کر دی۔ تاہم صدر، اسلامی جمہوریہ پاکستان کے دفتر نے بینکنگ محتسب پاکستان کے فیصلے کو برقرار رکھتے ہوئے بینک کی اپیل کو مسترد کر دیا۔

## کیس نمبر 9: بینک کے عملے کی جانب سے خرد برد

شکایت کنندہ نے بتایا کہ اُن کا راولپنڈی میں ایک بینک کی برانچ میں اکاؤنٹ تھا۔ 2016 میں انہوں نے کراچی میں اپنا مکان -/10,500,000 روپے میں فروخت کیا اور یہ رقم اپنے اکاؤنٹ میں جمع کرادی۔ برانچ کے ریلیشنشپ مینیجر نے انہیں ترغیب دی کہ وہ اگر اپنی رقم کی سرمایہ کاری بینک کے اسٹاکس اور ایک انشورنس کمپنی میں کر دیں تو انہیں پرکشش منافع حاصل ہوگا۔ نتیجتاً انہوں نے ریلیشنشپ مینیجر کو 6.6 ملین روپے بینک کے اسٹاک فونڈ کے لئے، 1.5 ملین روپے انشورنس کمپنی کے لئے اور -/388,000 روپے نقد دیگر سرمایہ کاری کے لئے دے دئے۔ 2018ء میں ریلیشنشپ مینیجر نے انہیں سونے کے عوض بینک سے قرض کی سہولت حاصل کرنے کی ترغیب دی جس پر انہوں نے اپنا 25 توالے سونا اور ہیروں کا سیٹ اس قرض کے لئے جمع کرادیا جس کے بدلے انہیں ایک ملین روپے کا قرض حاصل ہوا جو بینک کے اسٹاک فونڈ میں انویسٹ کر دیا گیا۔ انہیں 2020ء تک اسٹاک کی رقم پر باقاعدگی سے منافع ملتا رہا۔ اس دوران انہیں جعلی بینک اسٹیٹیمینٹس فراہم کئے جاتے رہے۔ بعد ازاں، انہیں معلوم ہوا کہ مذکورہ ریلیشنشپ مینیجر نے برانچ مینیجر کی حیثیت سے کسی اور بینک میں ملازمت کر لی ہے۔ اسی شخص نے ان سے کہا کہ وہ اپنی سرمایہ کاری ٹرم ڈپازٹ کے طور پر اس کی برانچ میں منتقل کر دیں۔ جب انہوں نے بینک سے ٹرم ڈپازٹس کی بابت معلومات حاصل کیں تو انہیں یہ جان کر دھچکا پہنچا کہ ان کے اکاؤنٹ میں ایسی کوئی رقم نہیں ہے۔ جس اس پر انہوں نے بینک میں اس بابت شکایت جمع کرائی۔ ریلیشنشپ مینیجر اور اُس کا عملہ اس غیر قانونی اور دھوکہ دہی پر مبنی ٹرانزیکشنز کے ذمہ دار قرار پائے۔ تاہم بینک نے اس سلسلے میں انہیں (شکایت کنندہ کو) اس مالی نقصان کا کوئی معاوضہ ادا نہیں کیا۔ اس پر انہوں نے دونوں بینکوں میں اپنی سرمایہ کاری کے حوالے سے ایف آئی آر درج کرائی اور اپنی شکایت بینکنگ محتسب پاکستان کے دفتر میں بھی درج کرادی کہ انہیں مجموعی طور پر ایک کروڑ 5 لاکھ روپے کی رقم واپس دلوانے کے لئے احکامات جاری کئے جائیں۔

سماعت کے دوران بینک کے وکیل نے PLD 2018 لاہور 322 کے تحت لاہور ہائی کورٹ کے فیصلے کا حوالہ دیتے ہوئے ابتدائی اعتراض کیا۔ یہ فیصلہ بینکنگ محتسب پاکستان کی قانونی عملداری کو محدود نہیں کرتا ہے۔ یہ فیصلہ واضح طور پر بیان کرتا ہے کہ بینکنگ محتسب کسی عدالتِ عالیہ یا عدالتِ عظمیٰ کے ماتحت کوئی عدالت یا ٹریبیونل نہیں ہے، لہذا محتسب قانونی اختیار استعمال نہیں کر سکتا اور نہ ہی اس طرح کے احکامات (binding orders) جاری کر سکتا۔ مزید یہ کہ، معزز لاہور ہائی کورٹ نے اس مقدمے میں کے فیصلے کے پیرا گراف 38 میں بینکنگ محتسب کو اجازت دی تھی کہ وہ شکایت کو سُن سکے۔ اسی طرح اسی موضوع پر دو علیحدہ مقدمے؛ بہ عنوان حبیب بینک لمیٹڈ بنام FOP میں 2018 CLD1152 اور ایم سی بی بنام FOP میں 2019 PLD 624 سندھ کراچی 624 کے فیصلوں میں بینکنگ محتسب کی عمل داری کو تسلیم کیا گیا ہے۔ معزز ہائی کورٹس کے ان تمام فیصلوں کو معزز عدالتِ عظمیٰ میں زیر سماعت اپیل میں جمع کیا گیا ہے۔ بیان کی گئی قانونی صورت حال اس بات کو واضح کرتی ہے کہ ان قانونی اعتراضات کی کوئی بنیاد نہیں ہے اور ان کا مقصد مقدمے کی کاروائی میں تاخیر کرنا ہے تاکہ خاتون شکایت کنندہ کو انصاف کی فراہمی نہ ہو سکے۔ بینک نے اس سے انکار نہیں کیا کہ دھوکہ دہی کی ان ٹرانزیکشنز کو وقوع پذیر ہونے کے وقت ریلیشنشپ مینیجر بینک کا ملازم نہیں تھا اور نہ ہی اس بات سے انکار کیا کہ ریلیشنشپ مینیجر کو FIA نے گرفتار کیا تھا اور بینک ملازمت کے دوران دھوکہ دہی کی واردات پر اس کے خلاف فوجداری مقدمہ خصوصی جج (بینک جرائم) کے روبرو زیر سماعت ہے اور معزز عدالت اس کی درخواست ضمانت خارج کر چکی ہے۔ اوپر بیان کئے گئے حقائق اور قوانین اور خاتون شکایت کنندہ کے اکاؤنٹ میں خرد برد کی ٹرانزیکشنز ہونے کی ترتیب اس عمل کو بینک کی قانونی ذمہ دار قرار دیتے ہیں کیونکہ شکایت کنندہ کے اکاؤنٹ میں دھوکہ دہی کے ان واقعات کے رونما ہونے کے وقت ریلیشنشپ مینیجر اور اس کے شرکاء کار بینک کی ملازمت میں تھے۔ بینک نے بینکی قوانین اور طریقہ کار بیکاری کے بہترین معیارات پر عمل درآمد نہیں کیا۔ اس

بینکنگ محتسب پاکستان کے دفتر میں سماعت کے دوران شکایت کنندہ نے کہا کہ وہ ٹیکنالوجی کی بنیاد پر تیار کی گئی دورِ حاضر کی بینک مصنوعات کے بارے میں کچھ نہیں جانتے۔ انہوں نے نہ کبھی بینک سے ان سہولیات کے حصول کی لئے درخواست کی اور نہ ہی کبھی ماضی میں انہوں نے انٹرنیٹ / موبائل بینکنگ / ای کامرس کی کوئی ٹرانزیکشن کی۔ انہوں نے اس بات پر حیرانی کا اظہار کیا کہ ان کے اکاؤنٹ کو کس طرح استعمال کیا گیا جبکہ ان کی چیک بک اور اے ٹی ایم کارڈ ان کے پاس محفوظ ہے۔

بینک نے بتایا کہ کھاتے دار کی انٹرنیٹ بینکنگ کی آئی ڈی 21 ستمبر، 2022 کو ایکٹیویٹ کی گئی اور یہ متنازعہ ٹرانزیکشنز بھی اسی دن کی گئیں۔ ایک سوال کے جواب میں بینک کے نمائندے نے بتایا کہ شکایت کنندہ کی ADC (انٹر نل فنڈ ٹرانسفرز، انٹر بینک فنڈ ٹرانسفر اور ای کامرس وغیرہ) کی یومیہ حد 2.750 ملین روپے تھی جبکہ بل ادائیگی کے لئے کوئی حد مقرر نہیں تھی۔ اس بات کی بھی نشاندہی کی گئی کہ جب تک کہ ADC چینلز ایکٹیویٹ نہ ہوں، ڈیجیٹل اکاؤنٹ کے لئے استعمال کنندہ کی آئی ڈی نہیں تیار ہو سکتی۔ زیر سماعت مقدمے میں، شکایت کنندہ نے اسٹیٹ بینک آف

پاکستان کے پیمنٹس سسٹم دپارٹمنٹ کے سرکلر نمبر 3/2018 میں بیان کی گئیں ہدایات کے مطابق ADC/FT کے ذرائع سے استفادہ کرنے کے لئے اپنی رضامندی نہیں دی تھی (جس کو بینک نے بھی تسلیم کیا)۔ تاہم واضح ہدایات کے باوجود، بینک نے کھاتہ دار کی رضامندی کے بغیر ADC کے ذرائع کو ایکٹیویٹ کر دیا۔ بینک کا نمائندہ نہ تو اس بات کی توجیح پیش کر سکا اور نہ ہی بینکنگ محتسب کے دفتر کو اس معاملے میں مطمئن کر سکا۔

بینک، پیمنٹ سسٹم اینڈ الیکٹرانک فنڈ ٹرانسفر ایکٹ، 2007 کی دفعہ 41 کے مطابق متنازعہ ٹرانزیکشنز کی قانونی حیثیت ثابت کرنے میں ناکام رہا۔ اس لئے پیش کی گئیں معلومات اور دستاویزات اور فریقین کے دلائل کی بنیاد پر اور پیمنٹ سسٹم اینڈ الیکٹرانک فنڈ ٹرانسفر ایکٹ، 2007 اور اسٹیٹ بینک آف پاکستان کے قواعد و ضوابط پر عدم عمل درآمد کو مد نظر رکھتے ہوئے یہ ثابت ہوا کہ اس سلسلے میں بدانتظامی اور بد معاملگی ہوئی ہے۔

یہ ثابت ہوا کہ بینک، اسٹیٹ بینک آف پاکستان کے درج بالا سرکلر میں بیان کردہ آپریشنل کنٹرولز پر عمل درآمد نہیں کر سکا ہے جس کے نتیجے میں شکایت کنندہ کو مالی نقصان ہوا۔ بینکنگ محتسب پاکستان کی جانب سے بینک کو ہدایت کی گئی کہ وہ -/3,134,208 روپے بشمول -/600 روپے کے متفرق چار جز اور معاملے کے تصفیے تک اس رقم پر ہونے والے منافع کی رقم شکایت کنندہ کے اکاؤنٹ میں جمع کرائے اور ان احکامات پر عملدرآمد کی رپورٹ اس دفتر میں جمع کرائے۔ علاوہ ازیں، بینک صنعت بینکاری میں رائج طریقہ کار کے مطابق ضروری کاروائی کو پورا کرتے ہوئے متعلقہ (Acquirer) بینک سے -/747,000 روپے کی رقم واپس وصول کرے۔ بعد ازاں، بینک کی جانب سے بینکنگ محتسب پاکستان کے احکامات کی تعمیل کر دی گئی۔

شکایت کی جانچ پڑتال سے پہلو تہی کرنے کا فیصلہ بی پی آر ڈی سرکلر 2023/4 مورخہ 14.04.2023 کی صریحاً خلاف ورزی تھی۔ بینک کی جانب سے جمع کرائے گئے SMS کے ریکارڈ سے چند متنازعہ ٹرانزیکشنز عمل میں آنے کا ثبوت ملا۔ تاہم بینک کی جانب سے اس سلسلے میں شکایت کنندہ کو کوئی SMS نہیں بھیجا گیا۔ اس سے شکایت کنندہ کے اس موقف کی تائید ہوتی ہے کہ انہیں ان متنازعہ ٹرانزیکشنز کے بارے میں کوئی ایس ایم ایس الرٹ اور OTP موصول نہیں ہوا۔

جمع کرائی گئیں معلومات اور دستاویزات اور دونوں فریقوں کے دلائل کی بنیاد پر اور پیمینٹ سسٹم اینڈ الیکٹرانک فنڈ ٹرانسفر ایکٹ، 2007 کی شقوں اور اسٹیٹ بینک آف پاکستان کے قواعد و ضوابط پر عمل درآمد نہ کئے جانے پر بینک کی بدانتظامی اور بد معاملگی ثابت ہوئی اس لئے بینکنگ محتسب پاکستان کی جانب سے بینک کو ہدایت کی گئی کہ وہ 166,699.74 روپے شکایت کنندہ کے اکاؤنٹ میں جمع کرائے۔ بعد ازاں، بینک کی جانب سے بینکنگ محتسب پاکستان کے احکامات کی تعمیل کر دی گئی۔

### کیس نمبر 8: بینک کی جانب سے بینکنگ محتسب پاکستان کے احکامات کی تعمیل

شکایت کنندہ نے بتایا کہ اُن کا حویلیاں میں ایک بینک برانچ میں اکاؤنٹ ہے۔ 21 ستمبر، 2022 کو انہیں بینک کی ہیلپ لائن سے ملنے جلتے نمبر سے ایک کال موصول ہوئی اور فون کرنے والے نے خود کو بینک کا نمائندہ ظاہر کیا۔ چونکہ فون کرنے والا شخص اُن کے قومی شناختی کارڈ نمبر کے علاوہ اُن کا اکاؤنٹ نمبر بھی جانتا تھا اس لئے انہوں نے یہ سوچ کر کہ یہ کال بینک کی طرف سے ہی ہے، اپنا OTP کال کرنے والے شخص کو بتادیا۔ اس کے نتیجے میں 25 غیر مجاز ٹرانزیکشنز کے ذریعے اُن کے اکاؤنٹ سے مجموعی طور پر -/3,134,808 روپے نکال لئے گئے اور یہ متنازعہ ٹرانزیکشنز بل کی ادائیگی، انٹر نل فنڈز ٹرانسفر، انٹر بینک فنڈز ٹرانسفر، FBR کو ادائیگی اور FESCO اور MEPCO کے بلز کی ادائیگی کے لئے استعمال ہوئیں۔

بینکنگ محتسب پاکستان کے دفتر میں یہ معاملہ اٹھائے جانے پر متعلقہ بینک نے موقف اختیار کیا کہ شکایت کنندہ کی جانب سے بتائی گئیں ان ٹرانزیکشنز کو بینک کی طرف سے دھوکہ دہی کا عمل قرار نہیں دیا جاسکتا کیونکہ کھاتے دار کی یہ قانونی ذمہ داری ہوتی ہے کہ وہ کارڈ / اے ٹی ایم کا خفیہ نمبر / موبائل سم سمیت اپنی ذاتی معلومات کسی کو نہ بتائے۔ شکایت کنندہ کے اکاؤنٹ سے نکالی گئی رقم میں سے -/996,000 روپے کی رقم اسی بینک کے مختلف اکاؤنٹس میں منتقل کی گئی۔ علاوہ ازیں -/249,000 روپے کی تین انٹر بینک فنڈز ٹرانسفرز کی تین ٹرانزیکشنز کے ذریعے مجموعی طور پر -/747,000 روپے کی رقم منتقل کرنے کی کوشش کی گئی جسے بروقت ناکام بناتے ہوئے یہ رقم روک لی گئی جبکہ -/1,391,808 روپے کی بقیہ رقم بل ٹاپ اپ اور FBR, FESCO اور MEPCO کو ادائیگیوں میں استعمال ہوئی۔

## کیس نمبر 7: 166,544/60 روپے کی مشکوک ای کامرس ٹرانزیکشنز

شکایت کنندہ کے مطابق اُن کا لاہور میں ایک بینک کی برانچ میں اکاؤنٹ ہے اور 12 مارچ 2024 کو انہوں نے اتفاقاً بینک اپلیکیشن کے ذریعے اپنا بینک اکاؤنٹ اسٹیٹمنٹ دیکھا تو انہیں معلوم ہوا کہ 2 دسمبر، 2023 سے 15 مارچ، 2024 کے دوران اُن کے اکاؤنٹ سے 166,544/60 روپے کی 38 مشکوک آن لائن ٹرانزیکشنز کی گئی ہیں۔ مزید یہ کہ انہیں بینک کی جانب سے ان متنازعہ ٹرانزیکشنز کے حوالے سے نہ تو کوئی پاس ورڈ (OTP) اور نہ ہی کوئی ای میل الرٹ وصول ہوا۔ بعد ازاں، انہوں نے بینک کی ہیلپ لائن سے رابطہ کیا اور ان کا کارڈ اور اپلیکیشن بلاک کر دی گئی۔

معاملے کی جانچ پڑتال کے دوران بینک نے بتایا کہ شکایت کنندہ نے 26 مارچ، 2024ء کو بینک سے رابطہ کیا اور مطلع کیا کہ 4 دسمبر، 2023 سے 24 مارچ، 2024 کے دوران 3D حفاظت کے حامل ڈیبٹ کارڈ کے ذریعے مجموعی طور پر -/166,699.74 روپے کی 21 متنازعہ ٹرانزیکشنز کی گئی ہیں۔ چونکہ یہ متنازعہ ٹرانزیکشنز ماسٹر ویزا اصولوں کے مطابق OTP تصدیق کے بعد 3D حفاظتی موڈ کی تحت کی گئی تھیں، اس لئے بینک ان ٹرانزیکشنز کی رقم واپس نہیں کر سکتا۔

سماعت کے دوران، شکایت کنندہ نے بتایا کہ انہیں اپنے اکاؤنٹ میں دھوکہ دہی سے کی گئیں ان متنازعہ ٹرانزیکشنز کے بارے میں قطعی طور پر کوئی علم نہیں تھا کیونکہ انہیں ان ٹرانزیکشنز کی بابت بینک کی جانب سے نہ تو کوئی پیغام کے ذریعے مطلع کیا گیا اور نہ ہی ان ٹرانزیکشنز کی تصدیق کے لئے SMS یا ای میل کے ذریعے کوئی OTP بھیجا گیا۔ دریافت کرنے پر شکایت کنندہ نے بتایا کہ اس عرصے کے دوران کسی خریداری مرکز (POS) پر ڈیبٹ کارڈ استعمال ہونے پر انہیں ایس ایم ایس الرٹ موصول نہیں ہوئے۔

شکایت کنندہ نے مزید بتایا کہ وہ بینک سے کسی ایسے قانونی ثبوت فراہم کرنے کے لئے مسلسل درخواست کرتے رہے جس سے یہ ثابت ہو سکے کہ یہ متنازعہ ٹرانزیکشنز انہوں نے ہی کی تھیں اور بینک نے اس سلسلے میں فوری طور پر ان کے موبائل نمبر پر انہیں مطلع کیا ہو۔

بد قسمتی سے نہ صرف یہ کہ انہیں کوئی جواب نہیں دیا گیا بلکہ انہیں اطلاع دے دی گئی کہ چونکہ یہ اُن کی غلطی ہے اس لئے ان کی شکایت کو داخل دفتر کر دیا گیا۔ بینک کو ہدایت کی گئی کہ وہ اسٹیٹ بینک آف پاکستان کے بی پی آر ڈی سرکلر نمبر 23/4 کے تحت اس

سلسلے میں ایک تفصیلی رپورٹ فراہم کرے تاہم اس کے جواب میں بینک نے جواب دیا کہ چونکہ ای کامرس کی یہ متنازعہ ٹرانزیکشنز 3D حفاظت کے تحت تھیں، اس لئے بینک انتظامیہ نے اس بنیاد پر کہ دھوکہ دہی کا کوئی عمل واقع نہیں ہوا ہے، اس معاملے میں کوئی تحقیقات نہ کرنے کا فیصلہ کیا ہے۔ بینک کے اس موقف کے باوجود، بینک پر لازم تھا کہ وہ ڈیجیٹل بینکنگ کی اس مبینہ دھوکہ دہی کے بارے میں اپنے کھاتے دار کی درخواست کی باقاعدہ چھان بین کرتا، تاکہ اس واقعے کی بنیادی وجہ سامنے آ سکے۔ بینک کی جانب سے

سے 50 فی صد ٹرانزیکشنز پر اعتراض ہے۔ شکایت کنندہ نے دعویٰ کیا کہ انہوں نے نہ تو اپنی ذاتی معلومات یا خفیہ پاس ورڈ (OTP) کسی کو فراہم کیا اور نہ ہی ان متنازعہ ٹرانزیکشنز کے لئے کسی کو اختیار دیا۔ ان کے مطابق اُن کی رجسٹرڈ SIM کہیں گم ہو گئی تھی اور جب انہوں نے اپنی SIM کے دوبارہ اجراء کے لئے متعلقہ ٹیلی کام کمپنی سے رجوع کیا تو انہیں بتایا گیا کہ اُن کی SIM کسی اور شخص کو جاری کر دی گئی ہے۔

شکایت کی سماعت کے دوران شکایات کنندہ نے بتایا کہ وہ ڈیجیٹل بینکنگ (انٹرنیٹ بینکنگ / موبائل بینکنگ / ای۔ کامرس) سے ناواقف ہیں اور انہوں نے ماضی میں کبھی بھی نہ تو ان سہولیات کے حصول کے لئے درخواست کی اور نہ ہی کبھی اپنے اکاؤنٹ سے ADC ٹرانزیکشنز کیں۔ معلوم کرنے پر شکایت کنندہ نے بتایا کہ انہوں نے بینک سے ATM کارڈ نہیں لیا ہے اور انہوں نے اپنے اکاؤنٹ سے صرف چیک کے ذریعے ہی رقم نکالی ہیں۔ انہوں نے مزید بتایا کہ اُن کے موبائل کی SIM طویل عرصے تک استعمال میں نہیں رہی اور اس دوران موبائل کمپنی نے اُن کی SIM کسی اور شخص کے نام منتقل کر دی تھی۔ مئی 2021ء میں جب وہ متعلقہ برانچ میں اپنے اکاؤنٹ میں موجود رقم کا معلوم کرنے گئے تب انہیں یہ جان کر دھچکا لگا کہ انٹرنیٹ بینکنگ کی ٹرانزیکشنز کے ذریعے ان کے اکاؤنٹ سے تمام رقم غائب کر دی گئی ہے اور ان کے اکاؤنٹ میں صرف 1,421/40 روپے موجود ہیں۔ مزید تحقیق پر بینک کے نمائندے نے بتایا کہ نیٹ بینکنگ کی سہولت کو شکایت کنندہ کے اُس موبائل نمبر سے activate کیا گیا تھا جو بینک میں اُن کے نام سے رجسٹرڈ ہے۔

بینک نے اس حقیقت کا اعتراف کیا کہ ان متنازعہ ٹرانزیکشنز سے قبل شکایت کنندہ کی جانب سے ADC/FT کی سہولت استعمال کئے جانے کا کوئی ریکارڈ نہیں ہے۔ بینک اس ضمن میں کوئی دستاویز یا ثبوت پیش نہیں کر سکا کہ بینک کی جانب سے شکایت کنندہ کو واضح طور پر یہ بات بتادی گئی تھی کہ اُن کی جانب سے ڈیجیٹل / انٹرنیٹ / موبائل بینکنگ کی سہولت کی درخواست نہ دینے یا اس پر آمادگی ظاہر نہ کرنے کے باوجود اگر انہوں نے اپنی ذاتی معلومات کسی شخص کو فراہم کیں تو یہ درج بالا سہولیات دھوکہ دہی کے ذریعے ایکٹیویٹ کرائی جاسکتی ہیں۔

دستیاب شہادتوں اور ریکارڈ گئے بیانات کی بنیاد پر اس نتیجے پر پہنچا گیا کہ بینک، اسٹیٹ بینک آف پاکستان کی جانب سے وقتاً فوقتاً جاری کئے جانے والے مختلف سرکلرز میں بیان کردہ آپریشنل کنٹرولز پر عمل درآمد نہیں کر سکا ہے جس کے نتیجے میں شکایت کنندہ کو مالی نقصان ہوا۔ بینکنگ محتسب پاکستان نے بینک کو ہدایت کی کہ وہ -/955,000 روپے اور کوئی بینک چار جز وصول کئے جانے کی صورت میں یہ مجموعی رقم شکایت کنندہ کے اکاؤنٹ میں منتقل کرے اور -/55,000 روپے کی رقم ممبر بینک سے واپس لے۔ بعد ازاں، بینک کی جانب سے بینکنگ محتسب پاکستان کے احکامات کی تعمیل کر دی گئی۔

### کیس نمبر 5: غیر رجسٹرڈ موبائل فون کے ذریعے 1.295 ملین روپے کی دھوکہ دہی

شکایت کنندہ کے مطابق انہیں 18/4/2024 کو ایک بینک کی جانب سے ای میلز موصول ہوئیں جن میں انہیں ان کے انٹرنیٹ بینکنگ کے اکاؤنٹ میں مزید beneficiaries شامل ہونے کی بابت مطلع کیا گیا اور جس کے بعد ان کی اجازت کے بغیر انٹر بینکس فنانشل ٹرانزیکشنز کے ذریعے اُن کے اکاؤنٹ سے -/1,295,000 روپے نکال لئے گئے۔

بینکنگ محتسب پاکستان کے دفتر کی جانب سے معاملے کی چھان بین پر بینک نے مطلع کیا کہ اُن کے مذکورہ کسٹمر باقاعدگی سے انٹرنیٹ بینکنگ کی سہولت استعمال کرتے ہیں۔ تاہم اس کے باوجود انہوں نے اپنے موبائل فون پر موصول ہونے والے ایک جعلی لنک کے جھانسنے میں آکر پاس ورڈ (OTP) سمیت اپنی ذاتی معلومات دھوکہ بازوں کو فراہم کر دیں جس کی وجہ سے انہیں اس مالی نقصان کا سامنا کرنا پڑا۔

بینکنگ محتسب پاکستان کے دفتر میں مقدمے کی سماعت کے دوران، شکایت کنندہ نے بتایا کہ وہ انٹرنیٹ کی ایپلیکیشن اپنے آئی فون کے ذریعے استعمال کرتے ہیں، جو بینک میں رجسٹرڈ ہے۔ ایک سوال کے جواب میں بینک کے نمائندے نے مطلع کیا کہ ان تنازعہ ٹرانزیکشنز سے قبل، کسٹمر کے رجسٹرڈ فون پر بھیجے جانے والے OTP کے ذریعے ایک نیا موبائل فون رجسٹرڈ کرایا گیا تھا۔ جس کے بعد یہ تنازعہ ٹرانزیکشنز اسی موبائل فون کے ذریعے کی گئیں۔ یہ دریافت کرنے پر کہ آیا بینک نے اسٹیٹ بینک آف پاکستان کے BPRD سرکلر نمبر 4 مورخہ 14/4/2023 کے مطابق نئے فون کو رجسٹر کرنے سے قبل کسٹمر (Customer) کی NADRA سے بائیومیٹرک تصدیق کرائی گئی تھی، بینک کا جواب نفی میں تھا۔

دستیاب شہادتوں اور بیانات کی بنیاد پر یہ بات ثابت ہوئی کہ بینک کی جانب سے اسٹیٹ بینک آف پاکستان کے مذکورہ بالا سرکلر میں درج آپریشنل کنٹرول سے متعلق ہدایات پر عمل درآمد نہیں کیا گیا جس کے نتیجے میں شکایت کنندہ کو اس مالی نقصان کا سامنا کرنا پڑا۔ اس معاملے کا فیصلہ کرتے ہوئے بینکنگ محتسب پاکستان نے مذکورہ بینک کو ہدایت کی کہ وہ -/1,295,000 روپے شکایت کنندہ کو ادا کرے / اُن کے اکاؤنٹ میں جمع کرائے۔ بعد ازاں، بینک کی جانب سے بینکنگ محتسب پاکستان کے اس حکم کی تعمیل کر دی گئی۔

### کیس نمبر 6: انٹرنیٹ بینکنگ فنڈز ٹرانسفر کے ذریعے اکاؤنٹ سے 807,321/40 روپے کی خرد برد

شکایت کنندہ کے مطابق اُن کا لاہور میں ایک بینک کی برانچ میں اپنی اہلیہ کے ساتھ ایک جوائنٹ اکاؤنٹ تھا اور 28 نومبر 2020 تک اُن کے اکاؤنٹ میں 807,321/40 روپے موجود تھے۔ مئی 2021ء میں جب وہ اپنے کھاتے میں موجود بیلنس معلوم کرنے بینک برانچ گئے تو انہیں بتایا گیا کہ ان کے کھاتے میں صرف 1,421/40 روپے موجود ہیں۔

شکایت کی جانچ پڑتال پر بینک نے بتایا کہ شکایت کنندہ کو یکم جنوری سے 24 اپریل 2021ء کے دوران کی جانے والی ٹرانزیکشنز میں

آف پاکستان کے PSD سرکلر نمبر 5 کے پیرا گراف نمبر 4.2 (b) میں درج دو پہلو تصدیقی عمل سے متعلق ہدایات پر عملدرآمد میں ناکام رہا۔ مزید یہ کہ بینک، پیمنٹ سسٹمز اینڈ الیکٹرانک فنڈز ٹرانسفر ایکٹ، 2007 کے تحت تنازعہ ٹرانزیکشنز کی قانونی حیثیت ثابت کرنے میں بھی ناکام رہا۔ اپنے کٹڑوں کے کمزور نظام اور اسٹیٹ بینک آف پاکستان کی ہدایات کے عدم نفاذ کے باعث بینک، اسٹیٹ بینک آف پاکستان کے قوانین پر عملدرآمد میں ناکام رہا جس کے باعث شکایت کنندہ کو مالی نقصان کا سامنا کرنا پڑا۔ اس طرح یہ شکایت درست قرار پائی گئی اور بینک کو ہدایت کی گئی کہ وہ منہا کی گئی/-/184,400 روپے اور ساتھ ہی متعلقہ چارجز کے طور پر- /12,204 روپے کی رقم فوری طور پر شکایت کنندہ کے کھاتے میں جمع کرائے۔

### کیس نمبر 4: برآمدی آمدنی کے تبادلے / کریڈٹ میں کم رقم کی ادائیگی

شکایت کنندہ نے زرمبادلہ کے مینول (Foreign Exchange Manual) کے باب 12 کے پیرا گراف 6 میں بیان کئے گئے رہنما اصولوں کے تحت برآمدات سے حاصل ہونے والی رقم کی بروقت واپسی کو یقینی بنانے کے لئے اپنی درخواست میں اسٹیٹ بینک آف پاکستان کے FE سرکلر نمبر 1/2023 کا حوالہ دیتے ہوئے کہا کہ بینک نے ان ہدایات کی غلط تشریح کی اور اس برآمدی رقم کو اُس وقت کے مارکیٹ ریٹ کے بجائے Weighted Average Rate (WAR) کے مطابق تبدیل کرتے ہوئے اسے شکایت کنندہ کے کھاتے میں جمع کرایا۔

بینک کی اس غلطی کی وجہ سے شکایت کنندہ کو 2.8 ملین روپے کا نقصان ہوا۔ انہوں نے اس سلسلے میں بینک سے رابطہ کیا۔ تاہم بینک نے شکایت کنندہ کی تشریح کو تسلیم نہیں کیا جس پر انہوں نے بینکنگ محتسب پاکستان کے دفتر سے رابطہ کیا۔

بینکنگ محتسب پاکستان کے افسران کے ساتھ ملاقات میں متعلقہ بینک کے افسران کے سامنے واضح کیا گیا کہ اس سلسلے میں اُن کی تشریح درست نہیں ہے جس پر بینک کے نمائندوں نے اس مسئلے کے دوستانہ تصفیئے کے لئے شکایت کنندہ کے ساتھ گفت و شنید کی خواہش ظاہر کی۔ ان کی درخواست کو منظور کرتے ہوئے مسئلے کے حتمی حل کے لئے انہیں 30 دن کی مہلت دی گئی۔

اس سلسلے میں کوئی پیشرفت نہ ہونے پر 09.09.2024 کو اس مقدمے کی سماعت کی گئی جس کے دوران بینک کے نمائندگان نے ایک بار پھر اس مسئلے کے دوستانہ تصفیئے کے لئے 10 دن کی مزید مہلت طلب کی جو شکایت کنندہ کی رضامندی سے انہیں فراہم کر دی گئی۔

بعد ازاں متعلقہ بینک کی جانب سے بینکنگ محتسب پاکستان کے دفتر کو مطلع کیا گیا کہ شکایت کنندہ کے نقصان کا ازالہ کرتے ہوئے 2.8 ملین روپے کی رقم 02.10.2024 شکایت کنندہ کے کھاتے میں جمع کرادی گئی ہے جس کی تصدیق شکایت کنندہ کی جانب سے بھی کر دی گئی۔

بینکنگ محتسب پاکستان کے دفتر میں شکایت موصول ہونے پر متعلقہ بینک کو اپنی پوزیشن واضح کرنے کی ہدایت کی گئی۔ جواب میں بینک نے مطلع کیا کہ بیمہ پالیسیز کی منسوخی اور پریمیسیم کی پوری رقم کی واپسی کے لئے متعلقہ بیمہ کمپنی کے ساتھ کاروائی شروع کر دی گئی ہے۔

معاملے کی مسلسل پیروی کے بعد، مذکورہ بیمہ پالیسیز منسوخ کر دی گئیں اور بینک نے مجموعی طور پر -/1,787,500 روپے کی رقم (-/687,500 +500,000 -/600,000 روپے) شکایت کنندگان کے معتلقہ اکاؤنٹس میں واپس جمع کرادی۔ شکایت کنندگان نے رقوم کی وصولی کی تصدیق کرتے ہوئے اپنی مشترکہ شکایت کے حل پر اپنے اطمینان کا اظہار کیا۔

کیس نمبر 3: دھوکہ دہی پر مبنی -/184,400 روپے کی ای کامرس ٹرانزیکشنز کی رقم اور اس پر عائد ہونے والے -/12,204 روپے چارجز کی کھاتے دار کو واپسی

شکایت کنندہ نے اپنی درخواست میں کہا کہ جب وہ ATM سے رقم نکالنے گئے تو ان کے علم میں آیا کہ مختلف تاریخوں میں -/184,400 روپے اور ساتھ ہی متعلقہ چارجز کے طور پر -/12,204 روپے کی رقم ان کے اکاؤنٹ سے غیر مجاز طور پر منہا کر لی گئی ہے۔ انہوں نے اس کی شکایت فوری طور پر بینک کی ہیلپ لائن پر درج کرادی اور اپنا ATM کارڈ بھی بلاک کرادیا۔ انہوں نے اپنی درخواست میں مزید کہا کہ انہیں بینک کی طرف سے اپنے موبائل فون پر کوئی ایس ایم ایس موصول نہیں ہوا۔ بینک کی جانب سے ان کی شکایت پر کوئی کاروائی نہ ہونے پر اپنی رقم کی واپسی کے لئے انہوں نے بینکنگ محتسب پاکستان کے دفتر سے رجوع کیا۔

بینکنگ محتسب پاکستان کے دفتر کی جانب سے دریافت کرنے پر متعلقہ بینک نے مطلع کیا کہ شکایت کنندہ کی جانب سے -/184,400 روپے کی 19 متنازعہ آن لائن ای کامرس ٹرانزیکشنز کی گئیں جن پر عائد ہونے والے چارجز کی رقم -/12,204 روپے تھی۔ یہ ٹرانزیکشنز 13 دسمبر، 2022ء سے 18 دسمبر، 2022ء کے دوران 3D حفاظت کے حامل ڈیبٹ کارڈ کے ذریعے کی گئیں۔ ان متنازعہ ٹرانزیکشنز کے ضمن میں شکایت کنندہ کے رجسٹرڈ موبائل فون نمبر پر ایس ایم ایس الرٹ اور OTP پر بھیجے گئے۔

بینک سے کہا گیا کہ وہ OTP کارڈ کا رجسٹرڈ جس میں ان 19 تمام OTPs اور بھیجے گئے ہر پیغام کی تفصیلات شامل ہو، فراہم کرے۔ تاہم بینک یہ تفصیلات فراہم کرنے میں ناکام رہا اور بینک کی جانب سے اس بات کی تصدیق نہیں ہو سکی کہ ان تمام ٹرانزیکشنز کو 3D تحفظ حاصل تھا اور ان کے لئے OTPs شکایت کنندہ کو بروقت ارسال کئے گئے تھے۔ بینک سے کہا گیا کہ وہ یا تو OTPs بھیجے جانے کا واضح ثبوت فراہم کرے یا پھر مسئلے کو دوستانہ انداز میں حل کرنے کے لئے اس شکایت کا از سر نو جائزہ لے۔ بینک کی جانب سے شکایت کنندہ کے ساتھ مسئلے کو دوستانہ انداز میں حل کرنے میں ناکامی پر اس مقدمے کی باقاعدہ سماعت کا فیصلہ کیا گیا۔

بینک کے حکام نے مزید مہلت کی درخواست کی تاکہ اس بات کی جانچ کی جاسکے کہ آیا یہ متنازعہ ٹرانزیکشنز 3D حفاظت کے تحت تھیں یا نہیں۔ بینک کی درخواست پر اس کو جواب داخل کرانے کے لئے ایک ہفتے کا مزید وقت دیا گیا۔ تاہم بینک شکایت کنندہ کے اس دعوے کی تردید کرنے میں ناکام رہا کہ انہیں (شکایت کنندہ کو) ان متنازعہ ٹرانزیکشنز کے ضمن میں کوئی OTP موصول نہیں ہوا۔ بینک، بینکنگ کمپنیز آرڈینینس 1962 (BCO) کے سیکشن 82 (F(C) کے اپنے اس موقف کے حق میں کوئی ثبوت فراہم کرنے میں ناکام رہا کہ ان متنازعہ ٹرانزیکشنز کو 3D تحفظ حاصل تھا اور ہر ٹرانزیکشن کے لئے شکایت کنندہ کو OTP بھیجی فراہم کیا گیا تھا۔

بادی النظر میں، ان متنازعہ ٹرانزیکشنز کو 3D تحفظ حاصل نہیں تھا اور نہ ہی ان ٹرانزیکشنز کے لئے OTPs بھی فراہم نہیں کئے گئے تھے اس طرح بینک، اسٹیٹ بینک

## کیس اسٹڈیز

**کیس نمبر 1: اکاؤنٹ سے غیر مجاز طور پر -/7,316,500 روپے نکالے جانے کا معاملہ باہمی افہام و تفہیم سے حل کر لیا گیا۔**

اس مقدمے میں شکایت کنندہ نے شکایت درج کرائی کہ 18 جنوری 2024ء کو صرف ایک ہی دن میں انٹرنیٹ موبائل بینکنگ کی 34 ٹرانزیکشنز کے ذریعے اس کے اکاؤنٹ سے -/7,316,500 روپے کی رقم غیر مجاز طور پر نکال لی گئی۔ شکایت کنندہ نے مزید مطلع کیا کہ ان کے ATM کارڈ کی مدت پہلے ہی ختم ہو چکی تھی اور یہ کہ بینک کی جانب سے منظور کی جانے والی، ان کی آن لائن لین دین کی زیادہ سے زیادہ یومیہ حد -/500,000 روپے تھی۔

معاملے کا جائزہ لینے پر یہ بات سامنے آئی کہ شکایت کنندہ کی شکایت صحیح ثابت ہوئی۔ اس کے علاوہ صرف ایک دن میں IBFT کی 34 ٹرانزیکشنز عمل میں آئیں جو کسی بھی اکاؤنٹ اور اس میں موجود رقم سے قطع نظر ایک معمول سے ہٹ کر سرگرمی تھی۔ تاہم بینک کا چوبیس گھنٹے کام کرنے والا نگرانی کا نظام دھوکہ دہی کی اس کارروائی کو پکڑنے میں ناکام رہا اور شکایت کنندہ کو اس بھاری نقصان سے بچانے کے لئے فی الفور کوئی کارروائی نہیں کی جاسکی جبکہ اسٹیٹ بینک آف پاکستان کی پہلے سے واضح ہدایات موجود ہیں کہ دھوکہ دہی کی نشاندہی اور اس کو فوری طور پر روکنے کے نظام پر عمل درآمد کیا جائے۔ اس سے یہ ثابت ہوتا ہے کہ بینک کا تحفظی نظام کے بین الاقوامی معیار کے مطابق نہیں تھا جس کی وجہ سے دھوکہ بازوں کی شکایت کنندہ کے اکاؤنٹ تک رسائی ممکن ہو سکی اور نتیجتاً اسے بھاری نقصان کا سامنا کرنا پڑا۔

بینک کو اس کے اپنے سسٹم میں نقص /خامی کو تسلیم پر قائل کیا گیا جس پر بینک نے -/7,316,500 روپے کی رقم شکایت کنندہ کے اکاؤنٹ میں جمع کرادی۔ معاملے کے حل کئے جانے پر شکایت کنندہ نے اپنے اطمینان کا اظہار کیا۔

**کیس نمبر 2: شکایت کنندہ کے کھاتے سے بیمہ پالیسیز کے لئے بغیر اجازت منہا کی گئی -/1,787,500 روپے کی رقم کی واپس ادائیگی**

شکایت کنندگان نے شکایت درج کرائی کہ ان کی اجازت /اور ان کے علم میں لائے بغیر بیمہ پالیسیز کے اجراء کی مد میں ان کے اکاؤنٹس سے -/1,787,500 روپے منہا کر لئے گئے۔ بیمہ پالیسیز کے اجراء اور پرمیٹ منہا کئے جانے کا علم انہیں اپنے متعلقہ کھاتوں کے سہ ماہی اسٹیٹمنٹس سے ہوا۔ انہوں نے اس سلسلے میں فوری طور پر بینک میں شکایت جمع کرائی تاہم ان کی کوئی شنوائی نہیں ہوئی۔ جس پر انہوں نے اپنے مسئلے کے حل کے لئے بینکنگ محتسب پاکستان کے دفتر سے رجوع کیا۔



ملک کی اعلیٰ انتظامی سطح پر بینکنگ محتسب پاکستان کے ادارے کی خدمات کو سراہا جا رہا ہے اور حال ہی میں بینکنگ محتسب کی کوششوں کو سراہتے ہوئے صدر، اسلامی جمہوریہ پاکستان نے ان خیالات کا اظہار کیا:

”صدر مملکت نے شہریوں کو دھوکہ دہی اور بینکوں میں بدعنوانیوں اور دھوکہ دہی سے محفوظ رکھنے میں بینکنگ محتسب پاکستان کے کردار کو سراہا۔ انہوں نے کہا کہ شکایات کے حل اور متاثرین کو طویل قانونی عمل کے بغیر بروقت انصاف کی فراہمی میں بینکنگ محتسب کا ادارہ بہت اہم کردار کا حامل ہے۔ صدر مملکت نے عوام پر بھی زور دیا کہ وہ بینکوں کے ساتھ اپنے تنازعوں اور دھوکہ دہی کی وارداتوں کے خلاف بینکنگ محتسب پاکستان کی خدمات سے استفادہ کریں۔“

مزید برآں، صدر، اسلامی جمہوریہ پاکستان نے، جو بینکنگ محتسب کے احکامات/ فیصلوں کے خلاف اپیل سننے کا اختیار بھی رکھتے ہیں، شکایت کنندگان کے مسائل کے ہمدردانہ حل کے لئے متعدد مواقع پر رہنمائی بھی فراہم کی۔

ہم اسٹیٹ بینک آف پاکستان کے ممنون ہیں جو بینکنگ محتسب پاکستان کے دفتر کے قیام سے اب تک اس ادارے کو گراں قدر تعاون اور مدد فراہم کرتا چلا آ رہا ہے۔ اس تعاون میں اپنی عمارات میں ہمارے علاقائی دفاتر کے لئے جگہ کی فراہمی کے ساتھ ساتھ ٹیکنیکی مدد اور ہمارے عملے کی تربیت بھی شامل ہے۔ میں بینکنگ محتسب پاکستان کے ادارے کو مستقل طور پر مدد فراہم کرنے پر وزارت قانون و انصاف اور وزارت خزانہ کے حکام کا بھی شکریہ ادا کرتا ہوں۔

ادارے کو موصول ہونے والی اور حل کی گئی شکایات کی شماریاتی تفصیلات کے علاوہ چند کیس اسٹڈیز کو بھی اس رپورٹ میں شامل کیا گیا ہے کیونکہ یہ صنعت بینکاری میں شامل ہونے والے نئے افراد کی تربیت اور تمام قارئین کی معلومات کے لئے مفید ثابت ہوئی ہیں۔

مالیاتی معاملات میں رازداری کا عنصر سماجی زندگی کے کسی بھی پہلو سے زیادہ اہمیت کا حامل ہے۔ اس اصول کا احترام کرتے ہوئے، بینکنگ محتسب پاکستان کی سالانہ رپورٹ برائے 2023ء کو ترتیب دینے میں بینکر اور صارف کے مابین رشتے کی رازداری کو یقینی بنانے کے لئے انتہائی احتیاط اور دانش سے کام لیا گیا ہے۔

اس موقع پر بینکنگ محتسب پاکستان کی سالانہ رپورٹ برائے 2024ء پیش کرنا میرے لئے انتہائی مسرت اور اعزاز کا باعث ہے۔

سراج الدین عزیز

بینکنگ محتسب پاکستان

یہ نیا تصور جدید دور کی ٹیکنیکی ترقی بالخصوص ڈیجیٹل بینکنگ سے متعلق چیلنجز سے نمٹنے کے لئے صلاحیت کار میں بہتری کا بھی متقاضی ہے۔ مقامی مالی ماحول میں 'ڈیجیٹل بینکنگ' کی شمولیت اور اس کے استعمال میں اضافے کے باعث کئی نئے چیلنجز نے جنم لیا ہے جن سے نمٹنے کے لئے لازم ہے کہ بینکوں اور محتسب کے دفتر میں افرادی طاقت کو مسلسل جدید خطوط پر استوار رکھا جائے۔ اسی سلسلے میں بینکنگ محتسب کے ادارے میں 'سیکنے کے کلچر' کو فروغ دینے پر توجہ دی جا رہی ہے۔ عوام کی شکایات کو مؤثر انداز میں اور جلد از جلد وقت میں نمٹانے کے لئے ادارے کے افسران اور ملازمین کو مختلف تربیتی کورسز میں شرکت کے لئے نامزد جاتا رہا ہے جبکہ ادارے کے سینیئر ایڈمنسٹریٹرز اور دیگر ساتھیوں کی حوصلہ افزائی کی گئی کہ وہ مجموعی طور پر ٹیکنیکی مہارت اور کارکردگی کی بہتری کے لئے مختلف موضوعات پر پریزنٹیشنز دیں۔ ان پریزنٹیشنز نے بینکنگ محتسب پاکستان کے دفتر کے افسران اور ملازمین کی صلاحیتوں کو مزید نکھارنے میں بہت مؤثر اور اہم کردار ادا کیا ہے۔ ہمارے افسران و ملازمین کی صلاحیتوں کو مزید بہتر بنانے کے لئے ان پریزنٹیشنز کا اہتمام 2025ء میں اور آئندہ برسوں میں بھی کیا جاتا رہے گا۔

جولائی 2023ء میں اپنے فرائض سنبھالنے کے بعد سے میں بینکوں اور معاشرے کے مختلف طبقوں کے درمیان دھوکہ دہی، بد عنوانی اور بد انتظامی کے باعث پیدا ہونے والے تنازعات کو حل کرنے کے ضمن میں جوابدہ رہنے کے لئے اپنی ذمہ داریوں سے پوری طرح باخبر رہا ہوں۔

بکاری کی سہولیات کے لئے ڈیجیٹل اور الیکٹرانک ذرائع کے بڑھتے ہوئے استعمال کے نتیجے میں 2024ء کے دوران موصول ہونے والی متعلقہ شکایات کی تعداد میں بھی بے تحاشا اضافہ ہوا۔ علاوہ ازیں، موبائل اور ڈیجیٹل اپلیکیشنز کی تعداد میں اضافے کی وجہ سے بھی دھوکہ دہی کے واقعات بھی میں قابل ذکر اضافہ ہوا ہے اور بینکوں کے نگرانی کے اپنے نظام میں نقصان، خامیوں اور کمزوریوں سے فائدہ اٹھاتے ہوئے، دھوکہ باز افراد لاکھوں لوگوں کو ان کی جائز آمدنی اور بچتوں سے محروم کر رہے ہیں۔

حال ہی میں قائم کئے گئے 'ڈیجیٹل بینکس' بھی بینکنگ محتسب پاکستان کے دائرہ عمل میں شامل ہیں جس سے Fintech آپریشنز اور متعلقہ ٹیکنالوجیز میں مہارت رکھنے والے افراد کی تعیناتی کی ضرورت بڑھ گئی ہے۔

بینکنگ محتسب پاکستان کا دفتر، ڈاک اور ای میل کے علاوہ کراچی میں واقع اپنے سیکرٹریٹ اور اپنے علاقائی دفاتر میں شکایت کنندگان سے ذاتی ملاقات کے ذریعے بھی براہ راست شکایات وصول کرتا ہے۔ علاوہ ازیں، ادارے کو وزیراعظم کے پورٹل اور اسٹیٹ بینک آف پاکستان کے ساتھ ساتھ وفاقی محتسب پاکستان کے دفتر کے توسط سے بھی شکایات موصول ہوتی ہیں۔ 2023ء میں بینکنگ محتسب کے پورٹل کے قیام کے ساتھ ہی شکایات کی تعداد میں نمایاں اضافہ ہوا ہے۔ یہاں یہ تذکرہ بھی بے جا نہیں ہوگا کہ کراچی میں سیکرٹریٹ کے علاوہ آزاد جموں و کشمیر سمیت ملک کے سات مختلف شہروں میں بھی بینکنگ محتسب کے علاقائی دفاتر موجود ہیں۔

ان مقدمات میں جہاں شکایات کنندہ کو ذاتی طور پر سننا ضروری ہو، ان کے مسئلے کی سماعت کا اہتمام ہمارے علاقائی دفاتر میں کیا جاتا ہے تاکہ شکایات کنندگان کو ان کے دروازے پر انصاف فراہم کیا جائے اور انہیں بڑے شہروں تک سفر کے مالی بوجھ سے بچایا جاسکے۔

سال 2024ء کے دوران ہم نے اپنے مختلف مراکز پر مجموعی طور پر 1530 سماعتیں کیں جو ایک ریکارڈ ہے جبکہ سال 2023ء کے دوران شکایات کی 760 سماعتیں ہوئیں تھیں۔ کیلنڈر سال 2024ء کے دوران مجموعی طور پر 1646.1 ملین روپے کاریلیف فراہم کیا گیا جبکہ سال 2023ء میں مجموعی طور پر 1268.4 ملین روپے کاریلیف فراہم کیا گیا تھا۔

## بینکنگ محتسب پاکستان کا پیغام



’محتسب‘ عربی زبان کا لفظ ہے جو بنیادی لفظ ’حسب‘ سے اخذ کیا گیا ہے اور انگریزی زبان میں اکاؤنٹی بیلٹیٹی (Accountability) کے معنی میں مستعمل ہوتا ہے۔ اس تعریف کے پس منظر میں، بینکنگ محتسب پاکستان کے ادارے کے کام کرنے کا بنیادی اصول ایک غیر جانبدار رویہ اختیار کرنے کے ساتھ ساتھ اپنی استعداد کار کو بڑھانے اور اپنی خدمات کے معیار کو بھی بہتر بنانا ہے۔

خدمت کے معیار کی وضاحت کرتے ہوئے، یہ معیار صرف شکایات کے حل تک محدود نہیں بلکہ یہ ’انٹرنل کنٹرولز‘ اور ’گڈ گورننس‘ سمیت بین الاقوامی طور پر تسلیم شدہ بہترین طریقہ کار کو اپنانے کے ضمن میں بھی محتسب کے دفتر کے کردار کو بیان کرتا ہے۔

بینکاری کی خدمات استعمال کرنے والے صارفین کی جانب سے بینکنگ محتسب پاکستان کے ادارے پر اعتماد کا اظہار میرے لئے انتہائی خوشی کا باعث ہے۔ اس اعتماد کا ثبوت 2024 میں شکایات کی تعداد میں اضافے اور انہیں نمٹا دئے جانے سے ملتا ہے۔ بینکنگ محتسب پاکستان کا ادارہ لا تعداد تنازعات کو حل کرنے اور بالخصوص محدود وسائل رکھنے والے اُن ناخواندہ افراد کے مسائل حل کر کے بے حد اطمینان حاصل کرتا ہے، جنہوں نے اپنی زندگی بھر کی پونجی اور اپنا اعتماد بینکاری کے نظام کے حوالے کر دیا تھا۔

شکایت کنندگان کو فراہم کیا گیا ریلیف عوام کے اس اعتماد کی توثیق اور اس بات کا مظہر ہے کہ وہ شکایات کو نمٹانے کے ایک ایسے نظام کے خواہشمند ہیں جہاں انہیں بلا معاوضہ انصاف حاصل ہو سکے۔ 2024ء کے دوران شکایات کنندگان کی شکایات کو کم سے کم وقت میں حل کیا جانا، جیسا کہ ادارے کی رپورٹ میں درج ہے، ہمیں بینکاری کی خدمات کے دیگر شعبوں بشمول ڈپازٹس، لاکرز، ATM، تیسرے فریق کی مصنوعات، دھوکہ دہی، سائبر کرائم اور قرضوں کے طریقہ کار سے متعلق تنازعات کے تصفیے کے لئے اپنے اعتماد، استعداد اور پیشہ ورانہ مہارت کو مزید ترقی دینے کا ایک موقع فراہم کرتا ہے۔ مجھے یقین ہے کہ آنے والے برسوں میں بینک اور ان کے صارفین، بینکنگ محتسب پاکستان کی خدمات سے مستفید ہوتے رہیں گے اور ایک شراکت دار کے طور پر ہم، مسابقتی بینکاری کے موجودہ ماحول میں صارفین کی خدمات کے معیار کو مزید بہتر بنانے میں اپنا کردار مسلسل ادا کرتے رہیں گے۔ ہماری جانب سے بینکرز کو ہمیشہ یہ بات ذہن نشیں کرائی جاتی رہے گی کہ صارفین کی جانب سے موصول ہونے والی شکایات کو مثبت انداز میں دیکھا جائے کیونکہ ان کی بدولت بینکوں کو اپنے نظام میں کسی بھی خامی کو دور کرنے اور بینک صنعت میں ہونے والی مسابقتی ماحول میں اپنا مقام حاصل کرنے کا موقع مل سکتا ہے۔



# فہرست

بینکنگ محتسب پاکستان کا پیغام \_\_\_\_\_ 1

کیس اسٹڈیز \_\_\_\_\_ 5



### ہمارا مطمح نظر (مقصد)

جملہ تنازعات کو ضابطے کی رسمی اور خصمانہ کاروائی کے بجائے غیر رسمی اور باہمی رضامندی سے طے کرنا۔ ہم کسی پارٹی کی طرف داری نہیں کرتے۔

### تنظیم کا ادعا (دعویٰ)

یہ ادارہ ایک آزاد قانونی ادارہ کی طرح قائم کیا گیا ہے۔ تاکہ بینکوں اور صارفین کے درمیان ہونے والے تنازعوں کو طے کرے۔ یہ ہماری ذمہ داری ہے کہ ان تمام تنازعات کو جو ہمیں بھیجے جائیں ان کا بلا کسی لاگت کے اور بلا تاخیر کے ایسا حل تلاش کیا جائے جو غیر جانب دارانہ، شفاف اور جملہ فریقین کے لئے منصفانہ ہو۔

### بنیادی اقدار / اصول

ہم ایک مربوط ٹیم کی طرح کام کرتے ہیں۔ انفرادی فیصلہ سازی کی اجتماعی ذمہ داری قبول کرتے ہیں اور بنیادی اصولوں پر کوئی سمجھوتہ نہیں کرتے۔ ہم اس بات پر پختہ یقین رکھتے ہیں کہ ان اصولوں کو اپنا کر اور ان پر عمل کر کے ہم اپنی پیشہ وارانہ اور نجی زندگیوں میں بہتری لاسکتے ہیں۔

**ذمہ داری:** روزانہ تنازعوں کی ایک کثیر تعداد وصول کی جاتی ہے اور ہم عملی طور پر ایک ایسا معقول انداز اختیار کرتے ہیں جس کا نتیجہ شفاف اور مخلصانہ صورت میں ظاہر ہوتا ہے جو غیر رسمی اور فوری ہوتا ہے۔

**ہمدردانہ:** تنازعات خواہ کتنے ہی معمولی کیوں نہ ہوں، غیر ضروری تکلیف اور ذہنی دباؤ کا باعث ہوتے ہیں۔ ہم کھلے ذہن سے ہر تنازعے کا تجزیہ کرتے ہیں اور اگر ضروری محسوس کرتے ہیں تو متعلقہ فریقین کی بات چل اور ہمدردی سے سن کر تنازعہ کا عملی اور عدل پر مبنی حل تلاش کرتے ہیں۔

**لچک داری:** ہم اس بات پر یقین رکھتے ہیں کہ تنازعات کو دوستانہ اور مخلصانہ انداز سے طے کیا جاسکتا ہے۔ ہم تنازعہ کی کاروائی میں سختی سے حکم نہیں دیتے بلکہ اس کے بجائے ایسا ماحول پیدا کرنے کی کوشش کرتے ہیں جہاں تمام فریقین کو معقولیت اور مصالحت کی راہ اپنانے کی حوصلہ افزائی کی جائے۔

**قابل اعتبار:** ہم تمام شکایات کنندگان کا احترام کرتے ہیں اور ان سے اخلاق سے اور منصفانہ طور پر ملتے ہیں۔ کیونکہ اسی طریقے سے ہم ان کا اعتبار اور اعتماد حاصل کر سکتے ہیں۔

ہم نہ تو صارف کے پیچیدہ ہیں اور نہ ہی ان کے وکیل۔ غیر جانب داری اور کشادہ دلی ہمارے بحث و مباحثے کو توجہ فراہم کرتی ہے۔ ہماری **شفافیت:** خدمات بلا معاوضہ ہیں۔ ہم تمام تنازعات میں رازداری کا اہتمام کرتے ہیں۔ اور مصالحت کا ایسا طریقہ اختیار کرتے ہیں جو دونوں فریقوں کو قبول ہوتا ہے۔ ہم جو فیصلے کرتے ہیں وہ با اصول، واضح اور متوازن ہوتے ہیں اس لئے عقلیت پسند افراد کو ان کے پس منظر کو سمجھنے میں کوئی دشواری نہیں ہوتی۔





## Contact Details

All Complaints are to be addressed to Banking Mohtasib Pakistan's Secretariat at Karachi.

Complaints can be lodged through our website [www.bankingmohtasib.gov.pk](http://www.bankingmohtasib.gov.pk) or on following URL for Online Complaints.

**[www.bankingmohtasib.gov.pk/website/ComplaintForm.aspx](http://www.bankingmohtasib.gov.pk/website/ComplaintForm.aspx)**

**Addresses and contact numbers of all our Offices are given below:**

### Karachi Secretariat

Banking Mohtasib Pakistan Secretariat  
5<sup>th</sup> Floor, Shaheen Complex,  
M.R. Kiyani Road, Karachi

Telephone: +92-21-99217334 to 38  
Fax: 92-21-99217375

### Rawalpindi Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
The Mall , Rawalpindi

Telephone: 051-9273252  
Fax: 051-9273253

### Quetta Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
Shahrah-e-Abbas Ali, Quetta

Telephone: 081-9203144  
Fax: 081-9203145

### Lahore Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
Shahrah-e-Quaid-e-Azam, Lahore

Telephone: 042-99210444  
Fax: 042-99210421

### Peshawar Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
Saddar Road, Peshawar

Telephone: 091-9213438  
Fax: 091-9213439

### Multan Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
Kalma Chowk, Multan

Telephone: 061-9201482  
Fax: 061-9201481

### Muzaffarabad Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
Upper Chattar, Muzaffarabad

Telephone: 05822-215160

### Faisalabad Regional Office

Office of the Banking Mohtasib Pakistan  
c/o SBP, Banking Services Corporation  
M. A. Jinnah Road, Faisalabad

Telephone: 041-2601229

# بینکنگ محاسبہ پاکستان



## 2024



## سالانہ رپورٹ