

FPM DOMESTIC PEPS DATA APPROACH

FOR AML CFT SCREENING

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FPM PEPs Data Approach

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1 Purpose of Document

This document outlines the approach that FPM has adopted to acquire politically exposed persons' (PEP) data for AML/CFT screening purposes. It also details the scope of domestic data being acquired by FPM under this approach, and the organization structure that supports the acquisition and delivery of the politically exposed persons' information.

2 Introduction

Since 2019, FPM has been extensively engaged with numerous businesses in Pakistan, facilitating their AML/CFT compliance teams in addressing common challenges.

One of the biggest lacking that FPM identified through its meticulous research, was the unavailability of credible information about domestic PEPs. FPM research team evaluated one after another world's top, off-the-shelf sources for domestic PEPs information but all the efforts were to no avail.

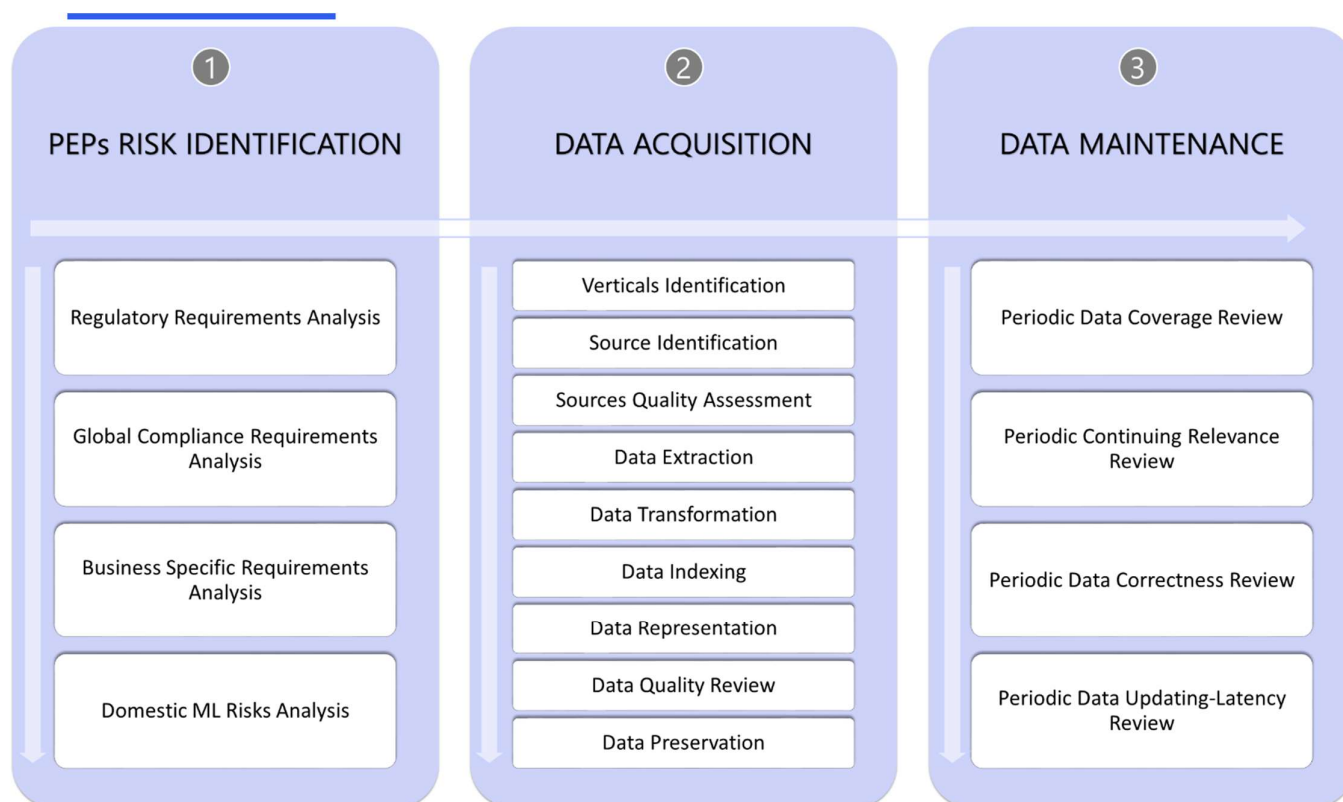
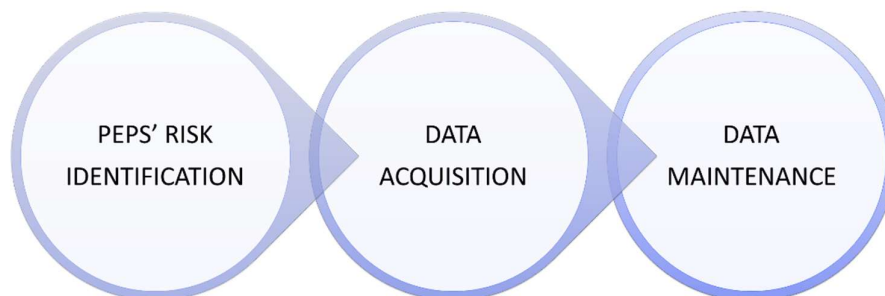
Finally FPM decided to step forward and build a comprehensive, credible archive of information about domestic PEPs. In a very short timeframe, FPM research team succeeded in acquiring information about tens of thousands of domestic PEPs with the quality of data on par with (or even above) that of other popular providers.

FPM domestic PEPs data acquisition policies are fully compliant with the guidelines given by international bodies, and the mechanism adopted for this purpose is based on the global best practices. The above stated objective is achieved by examining the most authoritative PEP definitions as outlined by:

1. The United Nations Convention Against Corruption (UNCAC)
2. Financial Action Task Force (FATF)
3. The European Union Fourth Anti-Money Laundering Directive
4. The UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations
5. The Joint Anti Money Laundering Steering Group (JMLSG)
6. The Wolfsburg Group

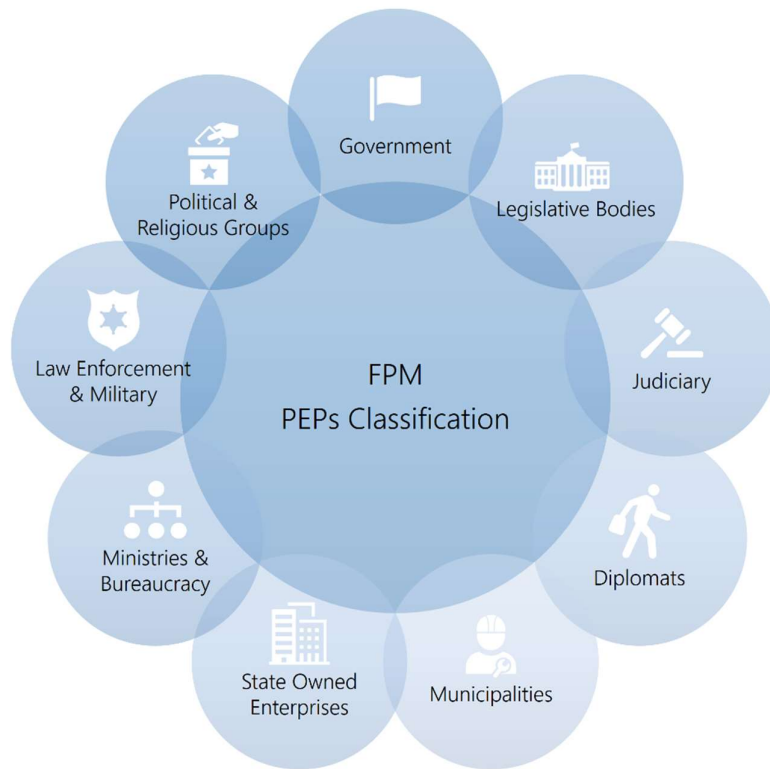
FPM Domestic PEPs Database is by far the largest collection of PEPs from Pakistan. It is instrumental in curbing corruption and money laundering risks with respect to domestic norms.

3 FPM PEPs' Acquisition Framework



4 FPM PEPs' Classification

FPM has structured its' PEP data in accordance with the definition of PEP given by FATF. Moreover, FPM has further expanded its coverage to the areas which are significant for AML compliance in consideration to the domestic norms of the country. A high-level classification of the PEPs' data can be found as under.



4.1 Government

Heads of state, cabinet members, ministers, at federal and provincial levels.

- President Office
- Prime Minister Office
- Cabinet
- National Assembly
- Senate

Government of Pakistan



4.2 Legislative Bodies

Members of legislative bodies (such as parliaments, senate) at federal and provincial jurisdiction.

- Present and Past Members of NA & Senate
- Present and Past Members of Provincial Assemblies
- Present & Past Members of GB, AJ&K
- Present & Past Members of Senate

Legislative Bodies



4.3 Ministries and Bureaucracy

Ministers, advisers, senior civil servants at regional and provincial levels.

- Past and Present Top Leadership of Federal and Provincial Ministries
- Top Ranks of 800+ Federal and Provincial Government Departments
- Appointments/Transfers of Federal and Provincial Government Officers

Ministries & Bureaucracy



4.4 Judiciary

Members of supreme courts, high courts, senior members of judicial bodies at federal, provincial and district jurisdiction.

- Top Ranks of Supreme Court and High Courts
- Appointments in District Courts
- Session Judges and Lower Courts Staff
- Office Bearers of Federal and Provincial Bars

Judiciary



4.5 Diplomats

Ambassadors, senior and middle ranking diplomats associated with foreign missions.

- Past and Present Foreign Ministers and Secretaries
- 105+ Foreign Missions and Associated Diplomats & Staff
- Ministry of Foreign Affairs Appointments
- Associated Staff and Diplomats of Foreign Services Academy of Pakistan

Diplomats



4.6 Law Enforcement & Military

Heads of military, law enforcement. Senior officials of the law enforcement agencies and authorities at federal and provincial levels.

- Coverage of 12 Law Enforcement Wings
- National Level Past and Present LEA Command
- 150+ District Level LEA Past & Serving Leadership
- Coverage of Middle and Junior (Inspectors, SI) Cadre Police Staff
- Past and Present Top Brass of Military Leadership
- Special Military Appointments

Law Enforcement & Military

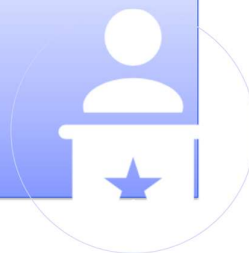


4.7 Political and Religious Groups

Top ranking political party officials, heads and senior members of mainstream political and religious groups.

- Top and Middle Ranks of 20 National Political Parties
- Top and Middle Ranks of 25 Regional Political Parties and Groups
- National Leadership of 12 Prominent Religious Groups

Political & Religious
Groups



4.8 Municipalities

Mayors of major cities, elected members of district councils, senior officials of municipal authorities.

- Mayors & City Councils of Metropolitan Corporations
- Members of 120+ District Councils
- Nazim, Naib Nazim of 2000+ Union Councils

Municipalities



4.9 State Owned Enterprises

Members of the administrative, management or supervisory bodies of state-owned enterprises.

- Directors and Top Management of 300+ SOE
- Management of Foreign Subsidiaries of SOE

State Owned Enterprises



5 Domestic PEPs Attributes

For FPM Domestic PEPs, following attributes are available in general for a large number of data records:

- Full Name
- Father Name
- CNIC
- Home Town, City, District
- Profession/Job Title
- Date of Birth
- Date of appointment and promotion
- Department, or institution
- Sources from where information was obtained
- Time reference when information was recorded or updated

6 PEPs' Data Ownership

PEPs' data being used by FPM for AML screening purposes is acquired from various government, administrative, and third party sources. The data sources are assessed carefully for authenticity and correctness. The data obtained from these sources goes through a series of transformations before it is compiled into a form suitable for screening job. The ownership of this data in its compiled form is retained by FPM and its partners solely.

7 PEPs' Data Acquisition and Update

FPM would like to express its commitment for continually expanding the coverage of the Domestic PEPs data. We welcome our clients' recommendations for further inclusion of authentic sources of information to the scope of FPM PEPs data acquisition. FPM Domestic PEPs have enough searchable criteria to help identifying true matches.

FPM PEPs data is obtained in good faith from sources which FPM and its partners consider to be reliable, however such data is not independently verified by FPM or its partners. Thereof, the use of FPM PEPs data by a client is at its sole risk; and FPM does not guarantee accuracy, completeness, correctness, timeliness of the data.

In terms of data maintenance, PEP sources where frequent data updates are expected, FPM research team keeps a constant watch through automated or semi-automated means and any new information found, is scheduled for acquisition on immediate basis.

Sources where information is made available at regular intervals, data acquisition is planned accordingly. In cases of existing PEPs data where no new information is anticipated, the default review cycle is planned every 6 months.

8 Warranty Disclaimer

The underlying information and data in the FPM Domestic PEPs Database is obtained from publically available government sources are neither the intellectual property of FPM nor provided or updated by FPM under this Agreement. Therefore neither client nor FPM can guarantee or warrant the accuracy or completeness of any information or data underlying any of the PEPs data. However, FPM undertakes to employ up-to-date versions of the PEPs data for review and evaluation, and promises to provide relevant references to the source of PEPs and their respective versions employed at the time of review and evaluation.

To learn more about FPM Automated AML/CFT Screening facility, please reach out to us at:

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Thank You.