

MCB-ARIF HABIB SAVINGS AND INVESTMENTS LIMITED

**COMPLIANCE REPORT
FOR THE PERIOD
FROM
JANUARY 01, 2021
TO
MARCH 31, 2021**



MCB-ARIF HABIB
Savings and Investments Limited

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COMPLIANCE REPORT
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FUND MANAGEMENT

1. SHORT SALE TRANSACTIONS

Clause (a) of Sub-Regulation No. 1 of Regulation No. 58 of the Non-Banking Finance Companies and Notified Entities Regulations, 2008 states that:

An Asset Management Company on behalf of a Collective Investment Scheme managed by it shall not affect a short sale in a security whether listed or unlisted.

Sub-Rule (i) of Rule No. 8 of Voluntary Pension System Rules, 2005 states that:

No Pension Fund Manager shall on behalf of a pension fund enter into a short sale transaction in any security.

During the period from January 01, 2021 to March 31, 2021, we observed the following short sale transactions in Open-end Schemes and Voluntary Pension Schemes managed by the Company:

(a) SHORT SALE TRANSACTIONS – SEARLE COMPANY LIMITED

In case of MCB Pakistan Stock Market Fund (MCB-PSM), MCB Pakistan Asset Allocation Fund (MCB-PAAF), Pakistan Capital Market Fund (PCMF), Pakistan Pension Fund – Equity Sub-Fund (PPF-EQ) and Alhamra Islamic Pension Fund – Equity Sub-Fund (ALHIPF-EQ), we observed short sale transactions in the shares of Searle Company Limited (SEARL) on January 01, 2021. These short sale transactions occurred due to sale of right shares which were due to receive on January 19, 2021 and not available in the holding as per CDC Statement. Short sale quantities were subsequently purchased on January 05, 2021 at T+1 and transactions were settled accordingly. Complete details of transactions are provided below:

Fund Symbol	Trade Details			Trade Date	Settlement Date	No. of Shares	Price	Holding as per CDC Statement	Short Sale Quantity	Right Shares to be credited
MCB-PSM	Sell	T + 2	REG	01-Jan-21	04-Jan-21	(333,000)	247.17	265,000	(68,000)	68,900
MCB-PAAF	Sell	T + 2	REG	01-Jan-21	04-Jan-21	(62,000)	250.25	55,000	(7,000)	7,150
PCMF	Sell	T + 2	REG	01-Jan-21	04-Jan-21	(20,000)	250.95	18,002	(1,998)	2,340
PPF-EQ	Sell	T + 2	REG	01-Jan-21	04-Jan-21	(36,000)	247.13	32,001	(3,999)	4,160
ALHIPF-EQ	Sell	T + 2	REG	01-Jan-21	04-Jan-21	(27,000)	246.22	24,000	(3,000)	3,120
MCB-PSM	Buy	T + 1	NDM	05-Jan-21	06-Jan-21	68,900	244.00			
MCB-PAAF	Buy	T + 1	NDM	05-Jan-21	06-Jan-21	7,200	244.00			
PCMF	Buy	T + 1	NDM	05-Jan-21	06-Jan-21	2,340	244.00			
PPF-EQ	Buy	T + 1	NDM	05-Jan-21	06-Jan-21	4,160	244.00			
ALHIPF-EQ	Buy	T + 1	NDM	05-Jan-21	06-Jan-21	3,120	244.00			

Central Depository Company of Pakistan Limited (Trustee) also reported these short sale transactions to the Securities and Exchange Commission of Pakistan vide its letters No. CDC/T&C-SII/DH/0003/2021 dated January 07, 2021 and CDC/T&C-SII/DH/0004/2021 dated January 07, 2021.

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(b) SHORT SALE TRANSACTION – SECURITY PAPERS LIMITED

In case of Alhamra Islamic Stock Fund (ALHISF), we observed a short sale in the shares of Security Papers Limited (SEPL) on March 17, 2021. This short sale transaction occurred due to transposition error (typo error) by using symbol of Synthetic Products Enterprises Limited (SPEL) instead of SEPL for posting two (2) sales transactions on March 01, 2021 and March 08, 2021 in the books of accounts of ALHISF. Due to this reason, a short fall of 12,400 shares occurred in SEPL on March 17, 2021 when Fund Manager sold complete shareholding of ALHISF in SEPL (33,300 shares) on March 17, 2021 (Settlement Date: March 19, 2021). Short sale quantity of 12,400 shares in SEPL was settled through square-up mechanism of Pakistan Stock Exchange on March 22, 2021. Complete details of transactions are provided below:

Trade Date	Particulars	As per Books of Accounts of ALHISF		As per CDC Statement	
		SEPL	SPEL	SEPL	SPEL
28-Feb-21	Opening Shares	165,700	581,664	165,700	581,664
01-Mar-21	Sell	-	(9,400)	(9,400)	-
02-Mar-21	Sell	(10,600)	-	(10,600)	-
03-Mar-21	Sell	(40,100)	-	(40,100)	-
05-Mar-21	Sell	(14,100)	-	(14,100)	-
08-Mar-21	Sell	-	(3,000)	(3,000)	-
10-Mar-21	Sell	(16,700)	-	(16,700)	-
11-Mar-21	Sell	(8,300)	-	(8,300)	-
12-Mar-21	Sell	(9,800)	-	(9,800)	-
15-Mar-21	Sell	(13,300)	-	(13,300)	-
16-Mar-21	Sell	(19,500)	-	(19,500)	-
16-Mar-21	Closing Shares	33,300	569,264	20,900	581,664
17-Mar-21	Sell	(33,300)	-	(33,300)	-
17-Mar-21	Closing Shares	-	569,264	(12,400)	581,664

The Company also reported this short sale transaction to SECP through electronic mail dated March 24, 2021 after consultation with the Trustee of ALHISF.

Chief Investment Officer's Comments:

SEARLE COMPANY LIMITED

Because of human error, shares yet to be received from rights offering subscribed by the Schemes were not marked unavailable into the System thus were included in available shares. A system based control is being developed after which right shares would automatically be marked unavailable. Strict instructions for future vigilance have been issued to the concerned staff.

SECURITY PAPERS LIMITED

An input (Typo) error caused this short sale, as data operator punched in SPEL (Synthetic Products Enterprise Limited), instead of SEPL (Security Papers Limited) in the system. This resulted in higher inventory of SEPL shares in the system than CDC holding, leading to short selling. While a dual control exists in the settlement staff which despite a system alert failed to take note of the error. Strict instructions for future vigilance have been issued to the concerned staff.

2. EXPOSURE IN MARGIN TRADING AND SPREAD TRANSACTIONS

For Income Scheme, Sub-Paragraph No. 9 (ii) – Annexure of SECP’s Circular No. 7 of 2009 requires that exposure to CFS (Margin Trading) and Spread transactions shall not exceed 40% of the net assets of the Scheme.

Ninth Row of the Table under Sub-Clause 2.1.1.2 (a) (xii) of the Offering Document of Pakistan Income Enhancement Fund (PIEF) specifies the maximum limit of 40% of the net assets for exposure in Margin Trading and Spread transactions.

During our compliance review, we noted that cumulative exposure of Margin Trading and Spread transactions in MCB-DCF Income Fund (MCB-DCFIF), Pakistan Income Fund (PIF) and PIEF exceeded statutory limit of 40% of total Net Assets on below-mentioned dates for which there is no regularization period under the law/ constitutive document. Details are as follows:

Scheme Symbol	NAV Date	Exposure as a %age of total Net Assets
MCB-DCFIF	25-Jan-21	40.22%
MCB-DCFIF	26-Jan-21	40.57%
MCB-DCFIF	27-Jan-21	41.35%
MCB-DCFIF	28-Jan-21	40.67%
MCB-DCFIF	11-Feb-21	40.34%
MCB-DCFIF	12-Feb-21	40.78%
MCB-DCFIF	15-Feb-21	40.27%
MCB-DCFIF	25-Mar-21	40.65%
PIF	16-Feb-21	40.52%
PIF	17-Feb-21	40.34%
PIEF	13-Jan-21	40.16%
PIEF	25-Jan-21	41.01%
PIEF	26-Jan-21	41.40%
PIEF	27-Jan-21	42.80%
PIEF	28-Jan-21	42.29%
PIEF	15-Feb-21	40.25%
PIEF	18-Feb-21	40.85%
PIEF	19-Feb-21	41.57%
PIEF	22-Feb-21	42.50%
PIEF	23-Feb-21	42.27%
PIEF	24-Feb-21	42.34%
PIEF	25-Feb-21	42.24%

Chief Investment Officer’s Comments:

These breaches occurred due to increase in market value of ready futures transactions.

3. NON-COMPLIANCE OF SECP'S CIRCULAR NO. 7 OF 2009 – PAKISTAN CAPITAL MARKET FUND

For Balanced Scheme, Sub-Paragraph No. 2 (ii) – Annexure of SECP's Circular No. 7 of 2009 states that:

Net assets ranging between 30% to 70% shall remain invested in listed equity securities at all times. The Scheme may sell in the cash settled futures market against a position held in the underlying security, however, the minimum 30% non-hedged exposure in listed equity securities shall be maintained at all times.

In case of Pakistan Capital Market Fund (PCMF), we noted that the investment in listed equity securities exceeded its statutory limit of 70% on below-mentioned dates for which there is no regularization period under the law. Details are as follows:

Date	Percentage of total Net Assets	Reason
08-Jan-21	70.17%	Price Appreciation
29-Jan-21	70.73%	Buying of 40,000 ordinary shares of Dera Ghazi Khan Cement Company Limited (DGKC) amounting to Rs. 4.840 million on January 29, 2021 and the remaining limit was Rs. 1.331 million on that date.
02-Feb-21	70.12%	Price Appreciation
03-Feb-21	70.27%	Price Appreciation
10-Feb-21	70.34%	Price Appreciation
16-Feb-21	70.66%	Price Appreciation
17-Feb-21	71.09%	Decrease in total Net Assets

Chief Investment Officer's Comments:

29-Jan-21

The IC instructed to increase exposure in DGKC, while selling equities of the same amount. However, dealer despite taking note of sell order given by the Fund Manager, forgot to place the sell order due to pure human error. Strict instructions for future vigilance have been issued to the concern staff while order re-checking process has been placed at the market close to avoid it in future.

Rest were either due to price appreciation or decrease in net assets, which were ratified on immediate basis.

4. NON-COMPLIANCE OF OFFERING DOCUMENT – ALHAMRA ISLAMIC ASSET ALLOCATION FUND

Row No. 1 of the Table under Clause 2.1.1.2 "Authorized Investments" of the Offering Document of Alhamra Islamic Asset Allocation Fund (ALHAA) prescribes the maximum limit of 90% for shariah compliant listed equity securities.

During our compliance review, we noted that exposure of ALHAA in shariah compliant listed equity securities exceeded its statutory limit of 90% on below-mentioned dates for which there is no regularization period under the Offering Document. Details are as follows:

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Date	Percentage of Net Assets	Reason
04-Jan-21	90.11%	Price Appreciation
06-Jan-21	90.54%	Price Appreciation
11-Feb-21	91.33%	Decrease in total net assets
22-Feb-21	92.34%	Buying of ordinary shares of the companies amounting to Rs. 62.688 million and the remaining limit was Rs. 12.406 million on that date. This non-compliance was adjusted on February 25, 2021.

Chief Investment Officer's Comments:

22-Feb-21

ALHAA received an investment of Rs. 85 million from the Customer on February 18, 2021. Since the required KYC documentation of that Customer was not complete, the transaction was not processed on that date. Such investment transaction was processed on February 25, 2021 on completion of required KYC documentation. As per Direction No. 02 of 2015, MCB-AH is required to issue Units to the Customer on the NAV applicable on the date of receipt of application for investment. In order to protect the interest of existing Unit Holders and to avoid return dilution, Fund Manager purchased shariah compliant listed equity securities amounting to Rs. 62.688 million on February 22, 2021. If we include the investment amounting to Rs. 85 million in the total Net Assets of ALHAA on February 22, 23, and 24, 2021, ALHAA would be compliant with the Clause No. 2.1.1.2 of the Offering Document.

Rest were either due to price appreciation or decrease in net assets, which were ratified on immediate basis.

5. NON-COMPLIANCE OF OFFERING DOCUMENT – MCB PAKISTAN ASSET ALLOCATION FUND

Row No. 2 of the Table under bullet (21) of Clause 2.1.1.2 "Authorized Investments" of the Offering Document of MCB Pakistan Asset Allocation Fund (MCB-PAAF) prescribes the maximum limit of 90% for listed equity securities.

During our compliance review, we noted that exposure of MCB-PAAF in listed equity securities exceeded its statutory limit of 90% on below-mentioned dates for which there is no regularization period under the Offering Document. Details are as follows:

NAV Date	Percentage of Net Assets	Reason
31-Jan-21	90.27%	Decrease in total Net Assets
19-Feb-21	91.30%	Decrease in total Net Assets
23-Feb-21	91.47%	Decrease in total Net Assets
24-Feb-21	90.12%	Decrease in total Net Assets
10-Mar-21	96.76%	Decrease in total Net Assets

Chief Investment Officer's Comments:

All these were due to decrease in total net assets and were regularized on immediate basis.

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6. NON-COMPLIANCE OF INVESTMENT LIMITS BY SCHEMES

During our compliance review from January 01, 2021 to March 31, 2021, following non-compliances of investment limits were observed for which there is no regularization period under the law:

Fund Name	Date of Non-compliance	Statutory/ Offering Document Reference	Detail of Non-compliance	Date of Adjustment	Chief Investment Officer's Comments
Pakistan Income Enhancement Fund (PIEF)	08-Mar-21	Sub-Regulation (5) of Regulation No. 55 of the Non-Banking Finance Companies and Notified Entities Regulations, 2008	Exposure in case of Attock Refinery Limited (ATRL) exceeded its statutory limit of 10% of total Net Assets and was at 10.62% of the total Net Assets of PIEF. This non-compliance occurred due to ready futures transaction in ATRL amounting to Rs. 6.768 million on March 08, 2021 and the remaining limit was Rs. 2.283 million on that date. This non-compliance was adjusted on March 10, 2021.	10-Mar-21	<i>It occurred because of human error while placing an order to broker. Attempt to reduce exposure was made but the scrip was at lower circuit restricting ability to reverse the transaction. Strict instructions for future vigilance have been issued to the concerned staff.</i>
MCB Pakistan Stock Market Fund (MCB-PSM)	20-Jan-21	Sub-Regulation (10) of Regulation No. 55 of the Non-Banking Finance Companies and Notified Entities Regulations, 2008	Exposure in case of listed group companies of MCB-AH exceeded its statutory limit of 10% of total Net Assets and was at 10.51% of the total Net Assets of MCB-PSM. This non-compliance occurred due to decrease in total Net Assets on January 20, 2021. This non-compliance was adjusted on January 21, 2021.	21-Jan-21	<i>It occurred due to decrease in total net assets and was regularized on immediate basis.</i>
MCB Pakistan Asset Allocation Fund (MCB-PAAF)	29-Jan-21	Sub-Regulation (10) of Regulation No. 55 of the Non-Banking Finance Companies and Notified Entities Regulations, 2008	Exposure in case of listed group companies of MCB-AH exceeded its statutory limit of 10% of total Net Assets and was at 10.11% of the total Net Assets of MCB-PAAF. This non-compliance occurred due to decrease in total Net Assets on January 29, 2021. This non-compliance was adjusted on February 01, 2021.	01-Feb-21	<i>It occurred due to decrease in total net assets and was regularized on immediate basis.</i>
Pakistan Income Fund (PIF)	15-Mar-21	First and Second Paragraphs of SECP's Direction No. 37 of 2016	Cumulative funds placed with microfinance banks, non-banking finance companies and modarabas exceeded its statutory limit of 25% of total Net Assets and was at 25.31% of total Net Assets of PIF. This non-compliance was adjusted on March 17, 2021.	17-Mar-21	<i>It occurred due to decrease in total net assets of PIF by around PKR 146 million.</i>
Pakistan Income Fund (PIF)	18-Mar-21	First and Second Paragraphs of SECP's Direction No. 37 of 2016	Cumulative funds placed with microfinance banks, non-banking finance companies and modarabas exceeded its statutory limit of 25% of total Net Assets and was at 25.12% of total Net Assets of PIF. This non-compliance was adjusted on March 19, 2021.	19-Mar-21	<i>It occurred due to decrease in total net assets of PIF by around PKR 85.51 million.</i>

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Fund Name	Date of Non-compliance	Statutory/ Offering Document Reference	Detail of Non-compliance	Date of Adjustment	Chief Investment Officer's Comments
Alhamra Daily Dividend Fund (ALHDDF)	25-Feb-21	Row No. 4 and 5 of the Table under Sub-Clause No. 2.1.1.2 "Authorized Investments" of the Offering Document	Exposure in Shariah Compliant Deposits and Shariah Compliant Commercial Papers having six (6) months or less maturity exceeded its allowed limit of 75% of total Net Assets and was at 75.51% of total Net Assets of ALHDDF. This non-compliance occurred due to decrease in total Net Assets of ALHDDF on February 25, 2021. This non-compliance was adjusted on February 28, 2021.	28-Feb-21	<i>Exposure was compliant at the time of investment. It occurred due to decrease in total net assets of fund.</i>

HUMAN RESOURCES

7. MANDATORY CERTIFICATION REQUIREMENT FOR SALES STAFF

Paragraph No. 1 of SECP's Circular No. 41 of 2016 states that:

The minimum eligibility criteria for a distributor to sell and distribute mutual fund units of a single AMC only shall be as follows:

- a) *Individuals with Matric/O level or FA/ FSc./ A Level or Graduation or Master or their equivalent with **certification from Institute of Financial Market of Pakistan (IFMP)**; OR.....*

Paragraph No. 3 of SECP's Circular No. 41 of 2016 states that:

*Individuals referred in **clause 1(a)** above not having IFMP certification may sell mutual fund units after taking in-house training of minimum 3 days from an AMC. However, these individuals whether acting as distributor in their individual capacity or as an employee of an AMC or company/firm shall be required to get new IFMP certification within 6 months from the date of joining or introduction of such new certification by IFMP whichever is later. **Moreover, after introduction of new IFMP certification, individuals referred in Clause 1(a) above, will not join the AMC or distributor to sell mutual fund units unless having such new IFMP certification.***

The Institute of Financial Markets of Pakistan (IFMP) launched new IFMP Certification for sales employees of asset management companies on January 01, 2017.

Subsequently, SECP's Circular No. 18 of 2018 relaxed the above-mentioned statutory requirements for sales staff having qualification of graduation or above by stating that:

*Individuals referred in clause 1(a) of the Circular No. 41 of 2016 having minimum qualification of graduation or above may sell mutual fund units after taking in-house training of minimum 3 days from an AMC without new IFMP certification. **However, these individuals shall get new IFMP certification within six months from date of joining the AMC or Distributor.***

Due to COVID-19 situation, SECP's Circular No. 11 of 2020 extended the above-mentioned six months to nine months for all new employees having minimum qualification of graduation or above joining during the period from April 09, 2020 to July 08, 2020.

1. During our compliance review on March 31, 2021, we noted that below-mentioned intermediate passed sales employees were hired by the Company who did not have IFMP Certification at the time of joining. Paragraph No. 3 of SECP's Circular No. 41 of 2016 prohibits the joining of intermediate passed sales employees without IFMP Certification.

S.No.	Employee UIN Number	Name of Sales Employee	Location	Date of Joining	Education
1	PE0830	Abdullah	Karachi	19-Nov-20	Intermediate
2	PE0844	Awais Yousuf	Karachi	14-Jan-21	Intermediate
3	PE0866	Muhammad Jazib Javed	Karachi	16-Feb-21	Intermediate

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As per IFMP's electronic mail dated March 29, 2021 addressed to Head of Human Resources, these sales employees were yet not registered for IFMP exams till the date of electronic mail.

2. During our compliance review on March 31, 2021, we noted that below-mentioned sales employees of MCB-AH had not obtained mandatory IFMP Certification within stipulated time resulting in non-compliance of above-mentioned SECP's directives.

S.No.	Employee UIN Number	Name of Sales Employee	Location	Date of Joining	Education	Tenor of Service till 31-Mar-21 (Months)
1	PE0812	Amna Riaz	Islamabad	13-Aug-20	B.COM	7
2	PE0815	Muhammad Tanveer	Islamabad	01-Sep-20	BA	7
3	PE0819	Maria Akbar	Rawalpindi	14-Sep-20	BBA	6

These sales employees joined the Company after July 08, 2020, therefore, they were required to acquire IFMP certification within six months from the date of joining. These sales employees could get enrolled for November 2020 attempt which was subsequently held in the month of December 2020 after postponement. However, as per IFMP's electronic mail dated March 29, 2021 addressed to Head of Human Resources, these sales employees were not registered for IFMP exams till the date of electronic mail.

Head of Human Resources' Comments:

1. *Mentioned employees were hired so that they can be trained by deputing them with senior sales employees. After completing IFMP Certification they will be assigned sales targets.*
2. *Ms. Amna Riaz & Maria Akbar were not registered with IFMP earlier as they were doing IFMP exam's preparation. However, they will be registered for upcoming exam scheduled for May 28, 2021. Mr. Muhammad Tanveer has resigned the Company on March 31, 2021.*

INVESTOR SERVICES

8. NON-COMPLIANCE OF SECP'S CIRCULAR NO. 26 OF 2015 AND DIRECTIVE NO. 4 OF 2015

Paragraph No. (c) of SECP's Circular No. 26 dated July 27, 2015 states that:

*Issue to the unit holder, within **48 hours** of the realization of funds, breakup of the total amount received from the unit holder, sales load charged and net amount invested in the fund on his behalf as per the following format:*

Particulars	Amount/ Percentage
Investment Amount Received	Rs.:
Front End Load	Rs.: (% of NAV per unit (at the time of investment))
Net Amount Invested	Rs.: (Investment Amount Received – Amount of Front End Load)
Back End Load (to be charged)	Rs.: (% of NAV per unit to be charged at the time of issuance or redemption (please specify))

Paragraph No. (c) of SECP's Directive No. 4 dated September 30, 2015 states that:

*Issue to a participant, within **48 hours** of the realization of funds, breakup of total contribution, front-end fee charged and the net amount transferred into a pension fund on his/her behalf as per the following format:*

Particulars	Amount/ Percentage
Gross contribution received	Rs.:
Front-end fee (sales load charged) deducted	Rs.: _____ (____% of contribution)
Net contribution invested	Rs.: _____ (gross contribution – amount of front-end fee)
Back-end or contingent fee (if any)	____% of the amount to be redeemed

During our compliance review covering period from December 01, 2020 to February 28, 2021, we noted some instances where the above-mentioned required details were not sent to the Unit Holders/Participants within forty-eight (48) hours of the realization of funds. Details are as follows:

Fund Symbol	Account Code	Account Title	NAV Date	Gross Amount	Sales Load Deducted	Fund Realization Date	SOA/ Letter Issue Date	Delay in Days
MCB-DCFIF	140858	RIAZ AHMAD LALI	19-Jan-2021	30,000,000	-	19-Jan-2021	02-Feb-2021	12
ALHIIF	54372	NILOFER HAK	10-Dec-2020	20,000,000	333,349	09-Dec-2020	17-Dec-2020	6
MCB-DCFIF	140859	MUHAMMAD MUJTABA	08-Feb-2021	20,000,000	333,350	09-Feb-2021	16-Feb-2021	5

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Fund Symbol	Account Code	Account Title	NAV Date	Gross Amount	Sales Load Deducted	Fund Realization Date	SOA/ Letter Issue Date	Delay in Days
PCF	138154	MUHAMMAD BASHIR CHOCHAN	11-Dec-2020	20,000,000	111,737	11-Dec-2020	17-Dec-2020	4
MCB-DCFIF	63876	ARSHAD MIRZA MOUGHAL	10-Feb-2021	7,500,000	125,006	10-Feb-2021	16-Feb-2021	4
MCB-DCFIF	140815	AZIM ULLAH	22-Jan-2021	1,000,000	16,667	22-Jan-2021	27-Jan-2021	3

Head of Investor Services' Comments:

We have looked into all the above cases individually and have found that the delay occurred due to late receipt of application forms. It is pertinent to mention here that no reservation/ complaint was received from any of the above listed customers with respect to the details of their transactions which is a clear evidence that they were satisfied and agreed with the same. However, we will ensure that necessary steps are taken in order to ensure 100% compliance of SECP's abovementioned directives in future.

SALES

9. INCOMPLETE REQUIRED DOCUMENTATION – NEW INVESTORS

Regulation 9 of the Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2020 issued on September 28, 2020 ("AML Regulations") states that:

The regulated person shall:

- (a) identify the customer; and
- (b) verify the identity of that customer using reliable and independent documents, data and information as set out in Annex 1.

Annex 1 of the AML Regulations specifies the minimum documents required for CDD according to the types of Customers. Annexure "A" of the AML/CFT and KYC/CDD Policy and Procedures Manual also specify the list of required documents for different types of Customers.

During our compliance review of **New Accounts** opened during the period from **December 01, 2020** to **February 28, 2021**, we noted various instances where required documentation was still not available in the digital archiving folder and/or hard copy file. Some of the instances are reproduced below:

Investor Registration Number	Name of Customer	Discrepancies
137080	DIN FARM PRODUCTS PVT LIMITED	(a) Certified copy of Resolution of Board of Directors for opening an account specifying the person(s) authorized to open and operate the account was not available in the digital archiving folder. (b) FATCA Addendum to Account Opening Form was not duly filled.
137881	HABIB METRO PAKISTAN PRIVATE LIMITED	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) Directors as per certified list of Directors and Directors as per Form-A as of September 26, 2019 were different. Latest Form-A/ Form-29 was not available in the digital archiving folder. (c) FATCA Addendum to Account Opening Form was not duly filled.
137883	KHAADI PAKISTAN SMC PRIVATE LIMITED	(a) Audited Financial Statements were not available in the digital archiving folder.
137882	FAUJI AKBAR PORTIA MARINE TERMINALS LIMITED	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) Certified copy of Certificate of Incorporation was not available in the digital archiving folder. (c) Certified copies of Memorandum and Articles of Association were not available in the digital archiving folder. (d) Certified copy of Resolution of Board of Directors for opening an account specifying the person(s) authorized to operate the account was not available in the digital archiving folder. (e) Duly filled and signed W-8BEN-E Form was not available in the digital archiving folder. (f) FATCA Addendum to Account Opening Form was not duly filled.

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Investor Registration Number	Name of Customer	Discrepancies
138299	MASTER MOTOR CORPORATION PRIVATE LIMITED	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) FATCA Addendum to Account Opening Form was not duly filled.
138300	MASTER MOTORS LIMITED	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) FATCA Addendum to Account Opening Form was not duly filled.
138618	IBRAHIM HOLDINGS PRIVATE LIMITED	(a) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated 100% income from dividends and profits as per available Financial Statements. W-8BEN-E Form should be filled as "Passive NFFE". (b) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated 100% income from dividends and profits as per available Financial Statements. CRS-2 Form should be filled as "Passive NFE" and CRS-3 Forms of all Controlling Persons should also be obtained.
138826	ROUTE 2 HEALTH PVT LTD STAFF PROVIDENT FUND TRUST	(a) Trust Deed of the Provident Fund was not registered. (b) Certified copy of By-laws/Rules & Regulations was not available in the digital archiving folder. (c) W-8BEN-E Form and CRS-3 Forms of all Controlling Persons were not duly filled.
138839 138840 138842	▪ ASKARI LIFE ASSURANCE COMPANY LIMITED ▪ ASKARI LIFE ASSURANCE COMPANY LIMITED PTF GFT ▪ ASKARI LIFE ASSURANCE COMPANY LIMITED WTO ULPIF	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) FATCA Addendum to Account Opening Form and W-8 BEN-E Form were not duly filled.
138935	MARI PETROLEUM COMPANY LIMITED	(a) Beneficial ownership details on Account Opening Form were incomplete. Individual Beneficial Owners of the Customer were not identified on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) was also not provided by the Customer. (b) Complete copy of Memorandum of Association was not available in the digital archiving folder. (c) Certified copy of Resolution of Board of Directors for opening an account specifying the person(s) authorized to open and operate the account was not available in the digital archiving folder. (d) Valid copy of CNIC of Mr. Abdul Rasheed Jokhio (Director) was not available in the digital archiving folder.
138936	RAVI AUTOS SUNDAR EMPLOYEES PROVIDENT FUND TRUST	(a) Trust Deed of the Customer was not registered. (b) Complete certified copy of By-laws/Rules & Regulations was not available in the digital archiving folder. (c) FATCA Addendum to Account Opening Form, W-8BEN-E Form, CRS-2 Form and CRS-3 Forms of all Controlling Persons were not duly filled.
139261	NIFT PROVIDENT FUND	(a) Signatures of Controlling Persons on CRS-3 Forms were not obtained.

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Investor Registration Number	Name of Customer	Discrepancies
139740	AIR UNIVERSITY ISLAMABAD	(a) Complete names and identity card numbers of members of Board of Governors (Beneficial Owners) were not mentioned on Account Opening Form. (b) Audited Financial Statements were not available in the digital archiving folder. (c) Complete certified copy of Manual of Air University Financial Rules, 2016 was not available in the digital archiving folder. (d) Certified list of members of Board of Governors was not available in the digital archiving folder. (e) Valid copies of CNIC/ NICOP/ Passport of all members of Board of Governors were not available in the digital archiving folder. (f) Resolution of the Board of Governors for opening an account authorizing the person(s) to operate the account was not available in the digital archiving folder. (g) FATCA Addendum to Account Opening Form was not duly filled. (h) W-8BEN-E Form was not available in the digital archiving folder. (i) Names of Controlling Persons were not mentioned on CRS-2 Form. (j) CRS-3 Forms of all Controlling Persons were not available in the digital archiving folder.
139851	YUNUS TEXTILE MILLS LIMITED	(a) YB Holdings Private Limited has 99.9 % shareholding in Yunus Textile Mills Limited. However, individual shareholders of YB Holdings Private Limited having 25% or more shareholding were not disclosed on Account Opening Form. Moreover, duly certified Register of Ultimate Beneficial Ownership maintained under Section 123A of the Companies Act, 2017 or duly signed letter disclosing the Individual Beneficial Owner(s) were also not provided by the Customer. (b) Complete certified copy of Articles of Association was not available in the digital archiving folder.
139937	THE UIC EMPLOYEES PROVIDENT FUND TRUST	(a) Trust Deed of the Provident Fund is not registered. (b) Financial Statements were not available in the digital archiving folder. (c) CRS-3 Forms of Mr. Amir Raza (Controlling Person) and Lt. Gen Ali Kuli Khan Khattak (Controlling Person) were not duly filled. (d) CRS 3 Forms of Ms. Shahnaz Sajjad Ahmed (Controlling Person) and Mr. Ashfaq Ahmed (Controlling Person) were not available in the digital archiving folder.
140105	SKYLINE ENTERPRISES (PRIVATE) LIMITED	(a) Audited Financial Statements were not available in the digital archiving folder. (b) CRS-3 Form of the Controlling Person was not available in the digital archiving folder.
140152	NOON SUGAR MILLS LIMITED STAFF PROVIDENT FUND	(a) CRS-3 Forms of two Controlling Persons were not available in the digital archiving folder and CRS-3 Forms of remaining two Controlling Persons were not duly filled. (b) Certified copy of Rules & Regulations was not available in the digital archiving folder.
140295	PORT QASIM AUTHORITY	(a) Complete names and identity card numbers of members of Executive Board (Beneficial Owners) were not mentioned on Account Opening Form. (b) Certified list of members of Executive Board was not available in the digital archiving folder. (c) Valid copies of CNIC/ NICOP/ Passport of members of Executive Board were not available in the digital archiving folder. (d) Audited Financial Statements were not available in the digital archiving folder. (e) FATCA Addendum to Account Opening Form was not duly filled. (f) W-8BEN-E Form was not available in the digital archiving folder.
140545	SAPPHIRE AGENCIES (PRIVATE) LIMITED	(a) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated 100% income from dividends as per available Financial Statements. W-8BEN-E Form should be filled as "Passive NFFE". (b) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated 100% income from dividends as per available Financial Statements. CRS-2 Form should be filled as "Passive NFE" and CRS-3 Forms of all Controlling Persons should also be obtained.

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Investor Registration Number	Name of Customer	Discrepancies
140740	AGHA STEEL INDUSTRIES LIMITED EMPLOYEES PROVIDENT FUND	(a) Certified copy of By-laws/Rules & Regulations was not available in the digital archiving folder. (b) CRS-3 Forms of all Controlling Persons were not available in the digital archiving folder. (c) Financial Statements was not available in the digital archiving folder.
140669	GALAXY CAPITAL SECURITIES PRIVATE LIMITED	(a) Complete copies of Memorandum and Articles of Association were not available in the digital archiving folder. (b) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated more than 50% income from dividends as per available Financial Statements. W-8BEN-E Form should be filled as "Passive NFFE". (c) Customer marked itself as "Active NFFE" in W-8BENE Form while the Customer generated more than 50% income from dividends as per available Financial Statements. CRS-2 Form should be filled as "Passive NFE" and CRS-3 Forms of all Controlling Persons should also be obtained.
140866	INNOVARGE TECHNOLOGIES PVT LIMITED	(a) Audited Financial Statements were not available in the digital archiving folder. (b) FATCA Addendum to Account Opening Form was not duly filled.
140920	MITSUBISHI CORPORATION PAKISTAN STAFF PROVIDENT FUND	(a) CRS-2 Form and CRS-3 Forms of all Controlling Persons were not duly filled.
140815	AZIMULLAH	(a) Customer is a forest guard in North Waziristan, Khyber Pakhtunkhwa and investing Rs. 1 million. An attested copy of Salary Slip (not more than three months old) was not available in the digital archiving folder.
140858	RIAZ AHMAD LALI	(a) Register Dakhala Kharij was not signed by the Assistant Director Land Record. This document was not even signed by the Branch Manager or Operations Manager or any other Authorized Person of the Distributor Bank having PA Number mentioning that he/she has seen duly signed Register Dakhala Kharij. (b) As per Register Dakhala Kharij, Customer sold property owned by her daughters at Rs. 30 million therefore ultimate beneficiaries of funds were his daughters. Therefore, POA or duly signed letters from his daughters should be obtained disclosing their father as ultimate beneficiary of funds otherwise KYC of daughters should be performed. (c) Customer disclosed one of his daughter as Ultimate Beneficiary in KYC Form and marked "No" in Ultimate Beneficiary. This conflict in details should be resolved. (d) Money trail from credit of cheques (Cheque No. 16051085 & 16051086) amounting to Rs. 30 million into the Bank Account of the Customer till the payment for investment amounting to Rs. 30 million was not available.

Head of Sales:

Sales team is working on each and every discrepancy aggressively. Letters, Emails, Follow-ups and all means of communication are underway. Due to Work from Home policy and rising COVID-19 cases, some of the Clients are delaying but however we will resolve these discrepancies soon.

RECURRING NON-COMPLIANCE

10. RECURRING NON-COMPLIANCE

Particulars	Reporting Status	Comments
FUND ACCOUNTING		
ANNOUNCEMENT OF NAV ON MCBAH WEBSITE Paragraph IV – "Announcement of Daily NAV" of SECP Circular No. 11 of 2009 states that <i>AMC shall announce net assets value (NAV) of all open end schemes (except for Funds of Funds scheme) being managed by them latest by 1830 hours daily on their own as well as on MUFAP's website. However, the NAV of Funds of Funds scheme shall be announced by 1030 hours of the next business day.</i> During the period from January 01, 2021 to March 31, 2021, we noted several instances where NAV was not announced within stipulated time. These instances have been reported to the Chief Executive Officer, Chief Operating Officer and Head of Fund Accounting through electronic mail. Instances are reproduced in " Annexure A " to this Compliance Report.	Instances reported in all Compliance Reports issued after the issuance of SECP's Circular No. 11 of 2009	Head of Fund Accounting's Comments: <i>We try our best to announce NAV as per paragraph IV – "Announcement of Daily NAV" of SECP Circular No. 11 of 2009, however the following events resulted in delay:</i> ▪ <i>Delay in PKRV, PKISRV and PSX rates;</i> ▪ <i>Application of discretion markup/markdown;</i> ▪ <i>Book closure;</i> ▪ <i>Announcement of Ex-NAV after PSX announcement; and.</i> ▪ <i>Clearance from auditor at year end/income certification.</i> <i>We have also requested SECP vides our letter No. 2018-19/CAD/SECP/MSS/1249 dated January 11, 2019 to either waive or extend the announcement time to 09:00 am of the following working day.</i>

BREACHES OF REGULATORY LIMITS

11. BREACHES OF REGULATORY LIMITS

As at March 31, 2021, we observed the following breaches of regulatory limits:

Fund Name	Counter Party/ Sector Name	Statutory Limit	Actual Exposure	Statutory Reference	Date of Breach	Reason for breach	Ending date of Regularization Period
Pakistan Capital Market Fund	Lucky Cement Limited	10% of total Net Assets	10.40% of total Net Assets	NBFC Regulations No. 55(5)	16-Feb-21	Price Appreciation	15-Jun-21
Pakistan Pension Fund (Equity Sub-Fund)	Bata Pakistan Limited	10% of Paid-up Capital	11.49% of Paid-up Capital	SECP's Circular No. 36 of 2009	15-Feb-21	Price Appreciation	13-Aug-21
Pakistan Pension Fund (Equity Sub-Fund)	Agriauto Industries Limited	10% of Paid-up Capital	10.23% of Paid-up Capital	SECP's Circular No. 36 of 2009	29-Mar-21	Price Appreciation	24-Sep-21
Alhamra Islamic Pension Fund (Equity Sub-Fund)	Lucky Cement Limited	10% of total Net Assets	10.66% of total Net Assets	SECP's Circular No. 36 of 2009	10-Feb-21	Price Appreciation	08-Aug-21

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ANNEXURE A

INSTANCES OF NON-COMPLIANCE WITH NAV ANNOUNCEMENT TIME

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
Friday, 1 January 2021	Friday, 1 January 2021	8:32 PM	MCB-PAAF
		8:33 PM	PCMF
		8:31 PM	MCB-PSM
		8:31 PM	ALHISF
Monday, 4 January 2021	Monday, 4 January 2021	7:01 PM	ALHIIF
		7:04 PM	PCF
		7:44 PM	PIEF
		7:48 PM	ALHAA
		7:58 PM	MCB-DCFIF
		7:36 PM	MCB-PSM
		7:37 PM	PIF
		7:45 PM	MCB-PAAF
		7:47 PM	PCMF
		7:48 PM	MCB-CMOP
		8:00 PM	MCB-PSF
		8:01 PM	ALHISF
	Tuesday, 5 January 2021	11:45 AM	ALHIAAP-II
	Tuesday, 5 January 2021	Tuesday, 5 January 2021	8:39 PM
8:11 PM			PIF
7:02 PM			PIEF
7:04 PM			ALHAA
7:26 PM			MCB-DCFIF
6:35 PM			MCB-CMOP
7:08 PM			MCB-PAAF
7:09 PM			PCMF
7:23 PM			ALHISF
7:24 PM		MCB-PSF	
Wednesday, 6 January 2021	12:33 PM	ALHIAAP-II	
Wednesday, 6 January 2021	Wednesday, 6 January 2021	7:02 PM	ALHIIF
		7:18 PM	PCF
		7:34 PM	MCB-DCFIF
		7:34 PM	ALHISF
		7:34 PM	MCB-PSM
		7:35 PM	MCB-PSF
		7:36 PM	PIF
		6:57 PM	ALHAA
		6:59 PM	PIEF
		7:14 PM	MCB-CMOP
		7:16 PM	PCMF
	7:17 PM	MCB-PAAF	
Thursday, 7 January 2021	11:29 AM	ALHIAAP-II	
Thursday, 7 January 2021	Thursday, 7 January 2021	8:27 PM	PIEF
		8:28 PM	ALHAA
		8:46 PM	MCB-CMOP
		9:01 PM	PCMF
		8:24 PM	MCB-DCFIF
		9:07 PM	MCB-PSM
		8:39 PM	ALHIIF
		8:47 PM	MCB-PSF
		8:48 PM	ALHISF
8:49 PM	PIF		
	9:31 PM	MCB-PAAF	

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Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
Friday, 8 January 2021	Friday, 8 January 2021	8:06 PM	PCF
		10:37 AM	ALHIAAP-II
		6:50 PM	MCB-DCFIF
		7:31 PM	MCB-PAAF
		7:45 PM	PCMF
		7:54 PM	ALHAA
		8:10 PM	PIEF
		6:33 PM	PCF
		7:05 PM	MCB-PSM
		7:06 PM	PIF
		7:25 PM	MCB-PSF
		7:45 PM	ALHISF
		7:10 PM	ALHIIF
	Monday, 11 January 2021	10:35 AM	ALHIAAP-II
Monday, 11 January 2021	Monday, 11 January 2021	7:21 PM	ALHAA
		7:22 PM	MCB-PSF
		7:29 PM	ALHISF
		7:30 PM	PIF
		7:46 PM	MCB-PSM
		6:34 PM	PIEF
		6:41 PM	MCB-DCFIF
		7:23 PM	MCB-PAAF
		7:27 PM	PCMF
		7:28 PM	MCB-CMOP
	Tuesday, 12 January 2021	10:34 AM	ALHIAAP-II
Tuesday, 12 January 2021	Tuesday, 12 January 2021	6:31 PM	PIF
		6:37 PM	ALHISF
		6:34 PM	ALHIIF
		6:36 PM	PIEF
		6:38 PM	ALHAA
		6:39 PM	MCB-DCFIF
		6:35 PM	MCB-CMOP
		6:37 PM	MCB-PAAF
		6:38 PM	PCMF
		6:47 PM	PCF
		7:00 PM	MCB-PSF
	Wednesday, 13 January 2021	12:54 PM	ALHDDF
		11:06 AM	ALHIAAP-II
Wednesday, 13 January 2021	Wednesday, 13 January 2021	12:00 PM	ALHIMMF
		10:31 PM	MCB-PAAF
		10:31 PM	PCMF
		10:32 PM	ALHAA
		10:32 PM	PIEF
		10:33 PM	ALHIIF
		10:35 PM	MCB-CMOP
		11:19 PM	PCF
		10:38 PM	MCB-DCFIF
		10:57 PM	PIF
		11:01 PM	MCB-PSM
		11:07 PM	MCB-PSF
		11:17 PM	ALHISF
	Thursday, 14 January 2021	12:16 PM	ALHIMMF
Thursday, 14 January 2021	Thursday, 14 January 2021	11:06 AM	ALHIAAP-II
		7:43 PM	ALHISF
		9:52 PM	ALHAA
		9:55 PM	MCB-DCFIF
		10:35 PM	PIF
		9:47 PM	MCB-PAAF

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Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		9:47 PM	PCMF
		9:48 PM	ALHIIF
		9:49 PM	MCB-CMOP
		9:49 PM	PIEF
		8:38 PM	MCB-PSF
		7:18 PM	PCF
		9:22 PM	MCB-PSM
	Friday, 15 January 2021	11:18 AM	ALHIAAP-II
Friday, 15 January 2021	Friday, 15 January 2021	7:28 PM	ALHISF
		7:38 PM	ALHAA
		7:56 PM	PIEF
		8:06 PM	PCMF
		8:07 PM	MCB-PAAF
		7:29 PM	MCB-PSM
		6:50 PM	ALHIIF
		8:09 PM	MCB-DCFIF
		7:07 PM	MCB-CMOP
		7:30 PM	PIF
Monday, 18 January 2021	Monday, 18 January 2021	9:53 PM	MCB-PSF
		6:59 PM	ALHISF
		7:38 PM	PCMF
		7:40 PM	MCB-PAAF
		6:59 PM	MCB-PSM
		7:17 PM	PIF
		7:41 PM	MCB-CMOP
		8:08 PM	MCB-DCFIF
		8:13 PM	ALHAA
		8:14 PM	PIEF
Tuesday, 19 January 2021	Tuesday, 19 January 2021	6:31 PM	MCB-PSF
		8:11 PM	ALHIIF
		7:08 PM	ALHISF
		8:21 PM	PIEF
		8:23 PM	ALHAA
		8:34 PM	ALHIIF
		7:36 PM	MCB-PSM
		7:37 PM	PIF
		7:37 PM	MCB-PSF
		6:58 PM	PCF
Wednesday, 20 January 2021	Wednesday, 20 January 2021	7:23 PM	MCB-DCFIF
		6:41 PM	MCB-CMOP
		7:34 PM	MCB-PAAF
		7:51 PM	PCMF
	Wednesday, 20 January 2021	11:05 AM	ALHIAAP-II
	Wednesday, 20 January 2021	7:28 PM	ALHISF
		7:17 PM	PCMF
		7:18 PM	MCB-PAAF
		9:47 PM	MCB-CMOP
		6:43 PM	MCB-DCFIF
		7:26 PM	ALHIIF
		6:47 PM	PIF
		6:47 PM	MCB-PSF
Thursday, 21 January 2021	Thursday, 21 January 2021	7:17 PM	ALHAA
		7:19 PM	PIEF
		10:35 AM	ALHIAAP-II
		9:30 AM	MCB-PSM
Thursday, 21 January 2021	Thursday, 21 January 2021	7:19 PM	MCB-PSF
		6:45 PM	PIF
		8:19 PM	MCB-CMOP

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Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		8:21 PM	MCB-PAAF
		8:23 PM	PCMF
		7:03 PM	PCF
		6:37 PM	PIEF
		6:39 PM	ALHAA
		6:43 PM	ALHISF
		7:41 PM	MCB-DCFIF
		8:07 PM	ALHIIF
Friday, 22 January 2021	Friday, 22 January 2021	11:19 AM	ALHIAAP-II
	Friday, 22 January 2021	7:47 PM	MCB-CMOP
		8:12 PM	PCMF
		8:13 PM	MCB-PAAF
		7:30 PM	PIF
		7:58 PM	ALHIIF
		8:45 PM	ALHISF
		7:55 PM	MCB-DCFIF
		9:10 PM	PCF
		9:12 PM	MCB-PSM
		10:29 PM	MCB-PSF
		8:12 PM	ALHAA
		8:15 PM	PIEF
	Monday, 25 January 2021	11:17 AM	ALHIAAP-II
Monday, 25 January 2021	Monday, 25 January 2021	7:34 PM	PIEF
		7:38 PM	ALHAA
		7:39 PM	MCB-PSF
		8:11 PM	PIF
		8:16 PM	MCB-PSM
		7:21 PM	PCF
		7:28 PM	ALHIIF
		7:46 PM	MCB-PAAF
		7:48 PM	PCMF
		7:49 PM	MCB-CMOP
		7:59 PM	MCB-DCFIF
		7:11 PM	ALHISF
	Tuesday, 26 January 2021	10:42 AM	ALHIAAP-II
Tuesday, 26 January 2021	Tuesday, 26 January 2021	6:45 PM	PIEF
		6:46 PM	ALHAA
		6:52 PM	MCB-CMOP
		6:53 PM	PCMF
		6:53 PM	MCB-PAAF
		7:06 PM	PCF
		7:05 PM	PIF
		7:14 PM	MCB-DCFIF
	Wednesday, 27 January 2021	10:53 AM	ALHIAAP-II
Wednesday, 27 January 2021	Thursday, 28 January 2021	10:36 AM	ALHIAAP-II
Thursday, 28 January 2021	Thursday, 28 January 2021	6:36 PM	MCB-PSM
		6:49 PM	PCMF
		6:52 PM	MCB-PSF
		7:06 PM	ALHISF
		6:39 PM	PCF
		6:48 PM	MCB-DCFIF
		6:34 PM	ALHIIF
		6:51 PM	PIEF
		6:51 PM	MCB-CMOP
		6:51 PM	MCB-PAAF
Friday, 29 January 2021	Friday, 29 January 2021	6:53 PM	ALHAA
	Friday, 29 January 2021	12:01 PM	ALHIMMF
Friday, 29 January 2021	Friday, 29 January 2021	9:13 PM	MCB-CMOP

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Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		10:44 PM	PCMF
		10:47 PM	MCB-PAAF
		11:15 PM	MCB-PSF
		9:50 PM	MCB-PSM
		9:18 PM	PCF
		9:47 PM	ALHISF
		9:54 PM	ALHAA
		10:14 PM	ALHIIF
	11:25 PM	PIEF	
	Saturday, 30 January 2021	12:57 AM	MCB-DCFIF
1:23 AM		PIF	
Monday, 1 February 2021	Monday, 1 February 2021	8:21 PM	MCB-DCFIF
		7:49 PM	MCB-PSM
		7:38 PM	PIF
		8:06 PM	PCMF
		9:08 PM	ALHISF
		8:06 PM	PIEF
		8:06 PM	MCB-PAAF
		8:08 PM	MCB-CMOP
		7:27 PM	ALHIIF
		8:07 PM	ALHAAF
		8:05 PM	MCB-PSF
		8:03 PM	PCF
	Tuesday, 2 February 2021	10:52 AM	ALHIAAP-II
Tuesday, 2 February 2021	Tuesday, 2 February 2021	7:01 PM	PCMF
		6:59 PM	PIEF
		7:02 PM	MCB-PAAF
		7:00 PM	MCB-CMOP
		6:57 PM	ALHIIF
	7:01 PM	ALHAAF	
Wednesday, 3 February 2021	10:55 AM	ALHIAAP-II	
Wednesday, 3 February 2021	Wednesday, 3 February 2021	6:50 PM	MCB-DCFIF
		6:44 PM	MCB-PSM
		6:46 PM	PCMF
		6:50 PM	ALHISF
		6:49 PM	PIEF
		6:56 PM	MCB-PAAF
		6:53 PM	MCB-CMOP
		6:52 PM	ALHAAF
	6:35 PM	MCB-PSF	
6:39 PM	PCF		
Thursday, 4 February 2021	10:56 AM	ALHIAAP-II	
Thursday, 4 February 2021	Thursday, 4 February 2021	7:21 PM	MCB-DCFIF
		7:46 PM	MCB-PSM
		7:45 PM	PIF
		7:51 PM	PCMF
		7:44 PM	ALHISF
		7:52 PM	PIEF
		7:54 PM	MCB-PAAF
		9:49 PM	MCB-CMOP
		7:38 PM	ALHIIF
		7:53 PM	ALHAAF
		7:44 PM	MCB-PSF
	6:50 PM	PCF	
Monday, 8 February 2021	11:16 AM	ALHIAAP-II	
Monday, 8 February 2021	Monday, 8 February 2021	7:08 PM	MCB-DCFIF
		7:03 PM	MCB-PSM
		7:14 PM	PIF

MCB-ARIF HABIB SAVINGS AND INVESTMENTS LIMITED
COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		6:49 PM	PCMF
		7:24 PM	ALHISF
		6:49 PM	MCB-PAAF
		6:44 PM	ALHIIF
		6:44 PM	ALHAAF
		6:58 PM	MCB-PSF
		6:47 PM	PCF
	Tuesday, 9 February 2021	10:39 AM	ALHIAAP-II
Tuesday, 9 February 2021	Tuesday, 9 February 2021	9:19 PM	MCB-DCFIF
		8:10 PM	MCB-PSM
		8:27 PM	PIF
		9:17 PM	PCMF
		8:01 PM	ALHISF
		9:09 PM	PIEF
		9:19 PM	MCB-PAAF
		9:15 PM	MCB-CMOP
		9:14 PM	ALHIIF
		9:07 PM	ALHAAF
		8:18 PM	MCB-PSF
		11:15 PM	PCF
	Wednesday, 10 February 2021	10:47 AM	ALHIAAP-II
Wednesday, 10 February 2021	Wednesday, 10 February 2021	6:38 PM	MCB-DCFIF
		6:57 PM	MCB-PSM
		6:33 PM	PIF
		7:28 PM	PCMF
		6:44 PM	ALHISF
		6:31 PM	PIEF
		7:28 PM	MCB-PAAF
		7:27 PM	MCB-CMOP
		7:09 PM	ALHIIF
		6:55 PM	ALHAAF
		6:58 PM	MCB-PSF
		7:02 PM	PCF
		7:11 PM	MCB-DCFIF
Thursday, 11 February 2021	Thursday, 11 February 2021	7:06 PM	MCB-PSM
		7:16 PM	PIF
		7:13 PM	PCMF
		7:18 PM	ALHISF
		7:12 PM	MCB-PAAF
		7:02 PM	MCB-CMOP
		6:44 PM	ALHIIF
		7:01 PM	MCB-PSF
		7:25 PM	PCF
	Friday, 12 February 2021	9:20 AM	ALHIMMF
		12:05 PM	ALHIAAP-II
		10:09 PM	ALHDDF
Friday, 12 February 2021	Friday, 12 February 2021	7:34 PM	MCB-DCFIF
		7:32 PM	MCB-PSM
		7:05 PM	PIF
		8:15 PM	PCMF
		7:41 PM	ALHISF
		8:17 PM	MCB-PAAF
		7:35 PM	MCB-CMOP
		7:30 PM	ALHIIF
		7:27 PM	ALHAAF
		7:20 PM	MCB-PSF
	Monday, 15 February 2021	7:27 PM	PCF
		7:02 PM	PIEF

MCB-ARIF HABIB SAVINGS AND INVESTMENTS LIMITED
COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
Monday, 15 February 2021	Monday, 15 February 2021	10:39 AM	ALHIAAP-II
		6:45 PM	MCB-DCFIF
		6:37 PM	MCB-PSM
		6:38 PM	PIF
		6:48 PM	PCMF
		6:54 PM	ALHISF
		6:48 PM	PIEF
		6:46 PM	MCB-PAAF
		6:45 PM	MCB-CMOP
		6:46 PM	ALHIIF
		6:46 PM	ALHAAF
		6:39 PM	MCB-PSF
		6:46 PM	PCF
Tuesday, 16 February 2021	Tuesday, 16 February 2021	6:31 PM	MCB-DCFIF
		6:31 PM	PIEF
		6:33 PM	ALHIIF
		6:32 PM	ALHAAF
Wednesday, 17 February 2021	Wednesday, 17 February 2021	10:53 AM	ALHIAAP-II
	Wednesday, 17 February 2021	7:00 PM	MCB-DCFIF
		6:47 PM	MCB-PSM
		6:51 PM	PIF
		7:05 PM	PCMF
		6:59 PM	ALHISF
		6:58 PM	PIEF
		7:05 PM	MCB-PAAF
		7:06 PM	MCB-CMOP
		7:03 PM	ALHIIF
		6:59 PM	ALHAAF
		6:35 PM	MCB-PSF
		6:38 PM	PCF
Thursday, 18 February 2021	Thursday, 18 February 2021	7:05 PM	MCB-DCFIF
		7:04 PM	PIF
		7:10 PM	PCMF
		6:37 PM	PIEF
		7:11 PM	MCB-PAAF
		7:09 PM	MCB-CMOP
Friday, 19 February 2021	Friday, 19 February 2021	6:52 PM	ALHIIF
		7:18 PM	MCB-DCFIF
		7:14 PM	MCB-PSM
		8:29 PM	PIF
		7:36 PM	PCMF
		7:40 PM	ALHISF
		7:37 PM	PIEF
		7:37 PM	MCB-PAAF
		10:20 PM	MCB-CMOP
		7:09 PM	ALHIIF
		7:35 PM	ALHAAF
		6:50 PM	MCB-PSF
Monday, 22 February 2021	Monday, 22 February 2021	6:48 PM	PCF
		6:51 PM	MCB-DCFIF
		6:47 PM	MCB-PSM
		6:31 PM	PIF
		6:32 PM	PIEF
		6:32 PM	ALHIIF
		6:32 PM	ALHAAF
Tuesday, 23 February 2021	Tuesday, 23 February 2021	6:40 PM	MCB-PSF
		6:58 PM	PCF
		6:31 PM	MCB-PSM

MCB-ARIF HABIB SAVINGS AND INVESTMENTS LIMITED
COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		6:50 PM	PCMF
		7:03 PM	ALHISF
		6:51 PM	PIEF
		6:53 PM	MCB-PAAF
		6:52 PM	MCB-CMOP
		6:52 PM	ALHIIF
		6:51 PM	ALHAAF
		6:56 PM	PCF
Wednesday, 24 February 2021	Wednesday, 24 February 2021	11:02 AM	ALHIAAP-II
	Thursday, 25 February 2021	10:44 AM	ALHIAAP-II
Thursday, 25 February 2021	Thursday, 25 February 2021	6:40 PM	MCB-DCFIF
		6:46 PM	MCB-PSM
		6:59 PM	PCMF
		6:42 PM	ALHISF
		7:00 PM	PIEF
		6:58 PM	MCB-PAAF
		7:03 PM	MCB-CMOP
		7:09 PM	ALHIIF
		6:56 PM	ALHAAF
		6:42 PM	MCB-PSF
Friday, 26 February 2021	Friday, 26 February 2021	10:27 PM	MCB-DCFIF
		9:13 PM	MCB-PSM
		10:56 PM	PIF
		9:45 PM	PCMF
		9:40 PM	ALHISF
		10:27 PM	PIEF
		10:25 PM	MCB-PAAF
		8:35 PM	MCB-CMOP
		9:47 PM	ALHIIF
		10:23 PM	ALHAAF
		8:16 PM	MCB-PSF
	Monday, 1 March 2021	8:03 PM	PCF
		11:22 AM	ALHIAAP-II
Monday, 1 March 2021	Monday, 1 March 2021	7:48 PM	MCB-DCFIF
		7:12 PM	MCB-PSM
		7:53 PM	PIF
		7:03 PM	PCMF
		7:27 PM	ALHISF
		7:46 PM	PIEF
		7:40 PM	MCB-PAAF
		7:02 PM	MCB-CMOP
		7:35 PM	ALHIIF
		7:31 PM	ALHAAF
		6:47 PM	PCF
	Tuesday, 2 March 2021	11:09 AM	ALHIAAP-II
Tuesday, 2 March 2021	Tuesday, 2 March 2021	7:27 PM	MCB-DCFIF
		7:12 PM	MCB-PSM
		6:41 PM	PIF
		7:24 PM	PCMF
		7:28 PM	ALHISF
		6:59 PM	PIEF
		7:02 PM	MCB-PAAF
		7:22 PM	MCB-CMOP
		7:22 PM	ALHIIF
		7:05 PM	ALHAAF
		7:11 PM	MCB-PSF
		6:47 PM	PCF
	Wednesday, 3 March 2021	11:55 AM	ALHIAAP-II

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COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
Wednesday, 3 March 2021	Wednesday, 3 March 2021	7:22 PM	MCB-DCFIF
		7:14 PM	MCB-PSM
		7:05 PM	PIF
		7:47 PM	PCMF
		7:23 PM	ALHISF
		7:34 PM	PIEF
		7:32 PM	MCB-PAAF
		7:45 PM	MCB-CMOP
		7:46 PM	ALHIIF
		7:22 PM	ALHAAF
		7:10 PM	MCB-PSF
	7:29 PM	PCF	
	Thursday, 4 March 2021	10:41 AM	ALHIAAP-II
Thursday, 4 March 2021	Thursday, 4 March 2021	7:18 PM	MCB-DCFIF
		7:20 PM	MCB-PSM
		7:01 PM	PIF
		7:46 PM	PCMF
		7:23 PM	ALHISF
		7:48 PM	PIEF
		7:46 PM	MCB-PAAF
		7:47 PM	MCB-CMOP
		7:49 PM	ALHIIF
		7:45 PM	ALHAAF
		7:21 PM	MCB-PSF
	6:59 PM	PCF	
Friday, 5 March 2021	Friday, 5 March 2021	9:01 PM	MCB-DCFIF
		7:56 PM	MCB-PSM
		8:45 PM	PIF
		8:57 PM	PCMF
		9:02 PM	ALHISF
		8:41 PM	PIEF
		8:26 PM	MCB-PAAF
		10:30 PM	MCB-CMOP
		8:58 PM	ALHIIF
		8:43 PM	ALHAAF
		7:50 PM	MCB-PSF
	7:07 PM	PCF	
	Monday, 8 March 2021	10:49 AM	ALHIAAP-II
Monday, 8 March 2021	Monday, 8 March 2021	8:02 PM	MCB-DCFIF
		7:36 PM	MCB-PSM
		9:27 PM	PIF
		7:57 PM	PCMF
		7:14 PM	ALHISF
		7:52 PM	PIEF
		7:54 PM	MCB-PAAF
		7:59 PM	MCB-CMOP
		8:06 PM	ALHIIF
		7:49 PM	ALHAAF
		7:24 PM	MCB-PSF
	7:42 PM	PCF	
	Tuesday, 9 March 2021	12:17 PM	ALHIAAP-II
Tuesday, 9 March 2021	Tuesday, 9 March 2021	6:35 PM	MCB-PSM
	Wednesday, 10 March 2021	11:40 AM	ALHIAAP-II
Wednesday, 10 March 2021	Wednesday, 10 March 2021	6:59 PM	MCB-DCFIF
		6:40 PM	MCB-PSM
		8:25 PM	PIF
		6:43 PM	PCMF
		8:11 PM	ALHISF

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COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		8:27 PM	PIEF
		8:23 PM	MCB-PAAF
		6:52 PM	MCB-CMOP
		6:53 PM	ALHIIF
		8:22 PM	ALHAAF
		6:49 PM	PCF
	Thursday, 11 March 2021	10:44 AM	ALHIAAP-II
Thursday, 11 March 2021	Thursday, 11 March 2021	6:59 PM	MCB-DCFIF
		6:33 PM	MCB-PSM
		6:47 PM	PIF
		7:42 PM	PCMF
		7:25 PM	ALHISF
		7:43 PM	PIEF
		7:34 PM	MCB-PAAF
		7:36 PM	MCB-CMOP
		7:37 PM	ALHIIF
		7:42 PM	ALHAAF
Friday, 12 March 2021	Friday, 12 March 2021	6:54 PM	PCF
		8:20 PM	MCB-DCFIF
		8:34 PM	MCB-PSM
		8:18 PM	PIF
		8:42 PM	PCMF
		8:41 PM	ALHISF
		9:08 PM	PIEF
		9:11 PM	MCB-PAAF
		8:25 PM	MCB-CMOP
		9:20 PM	ALHIIF
Monday, 15 March 2021	Monday, 15 March 2021	9:05 PM	ALHAAF
		8:29 PM	MCB-PSF
		8:38 PM	PCF
		8:09 PM	MCB-DCFIF
		7:23 PM	MCB-PSM
		9:01 PM	PIF
		8:11 PM	PCMF
		8:30 PM	ALHISF
		7:09 PM	PIEF
		8:35 PM	MCB-PAAF
Tuesday, 16 March 2021	Tuesday, 16 March 2021	8:36 PM	MCB-CMOP
		8:02 PM	ALHIIF
		7:16 PM	ALHAAF
		7:21 PM	MCB-PSF
		10:52 PM	PCF
	Tuesday, 16 March 2021	10:35 AM	ALHIAAP-II
	Tuesday, 16 March 2021	6:33 PM	MCB-DCFIF
		7:02 PM	MCB-PSM
		6:55 PM	PIF
		8:07 PM	PCMF
		7:38 PM	ALHISF
		7:26 PM	PIEF
		7:27 PM	MCB-PAAF
		7:21 PM	MCB-CMOP
		7:30 PM	ALHIIF
		7:29 PM	ALHAAF
Wednesday, 17 March 2021	Wednesday, 17 March 2021	7:02 PM	MCB-PSF
		6:52 PM	PCF
	Wednesday, 17 March 2021	10:52 AM	ALHIAAP-II
Wednesday, 17 March 2021	Wednesday, 17 March 2021	6:44 PM	MCB-PSM
		6:48 PM	PIF

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COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		7:20 PM	PCMF
		7:10 PM	ALHISF
		6:52 PM	PIEF
		6:54 PM	MCB-PAAF
		7:14 PM	MCB-CMOP
		6:43 PM	ALHIIF
		7:02 PM	ALHAAF
		6:45 PM	MCB-PSF
Thursday, 18 March 2021	Thursday, 18 March 2021	7:11 PM	PCF
		6:47 PM	MCB-DCFIF
		7:01 PM	MCB-PSM
		6:41 PM	PIF
		6:55 PM	PCMF
		6:37 PM	PIEF
		6:35 PM	MCB-PAAF
		6:38 PM	MCB-CMOP
		8:27 PM	ALHIIF
		6:34 PM	ALHAAF
Friday, 19 March 2021	Friday, 19 March 2021	6:41 PM	MCB-PSF
		9:05 PM	MCB-DCFIF
		8:42 PM	MCB-PSM
		8:24 PM	PIF
		8:46 PM	PCMF
		8:36 PM	ALHISF
		9:11 PM	PIEF
		9:12 PM	MCB-PAAF
		10:45 PM	MCB-CMOP
		9:11 PM	ALHIIF
Monday, 22 March 2021	Monday, 22 March 2021	9:05 PM	ALHAAF
		8:30 PM	MCB-PSF
		7:20 PM	PCF
		8:22 PM	MCB-DCFIF
		8:00 PM	MCB-PSM
		7:55 PM	PIF
		8:24 PM	PCMF
		8:24 PM	ALHISF
		8:22 PM	PIEF
		8:18 PM	MCB-PAAF
Wednesday, 24 March 2021	Wednesday, 24 March 2021	7:01 PM	MCB-CMOP
		8:18 PM	ALHIIF
		8:24 PM	ALHAAF
		7:01 PM	MCB-PSF
		7:52 PM	MCB-DCFIF
		7:49 PM	MCB-PSM
		8:28 PM	PIF
		6:57 PM	PCMF
		7:10 PM	ALHISF
		8:22 PM	PIEF
	Thursday, 25 March 2021	8:20 PM	MCB-PAAF
		7:58 PM	MCB-CMOP
Thursday, 25 March 2021	Thursday, 25 March 2021	7:28 PM	ALHIIF
		8:18 PM	ALHAAF
		7:05 PM	MCB-PSF
		7:06 PM	PCF
	Thursday, 25 March 2021	10:46 AM	ALHIAAP-II
		7:38 PM	MCB-DCFIF
		7:36 PM	MCB-PSM
		7:26 PM	PIF

MCB-ARIF HABIB SAVINGS AND INVESTMENTS LIMITED
COMPLIANCE REPORT
FOR THE PERIOD FROM JANUARY 01, 2021 TO MARCH 31, 2021

Date of NAV	Date of Posting	Time of Posting	Non-Compliant Fund
		7:25 PM	PCMF
		7:25 PM	ALHISF
		6:40 PM	PIEF
		6:38 PM	MCB-PAAF
		6:35 PM	ALHIIF
		6:58 PM	ALHAAF
		7:10 PM	MCB-PSF
		7:25 PM	PCF
Friday, 26 March 2021	Friday, 26 March 2021	10:57 AM	ALHIAAP-II
	Friday, 26 March 2021	7:53 PM	MCB-DCFIF
		6:59 PM	MCB-PSM
		8:14 PM	PIF
		7:14 PM	PCMF
		7:48 PM	ALHISF
		8:07 PM	PIEF
		8:09 PM	MCB-PAAF
		8:14 PM	ALHAAF
		6:52 PM	MCB-PSF
		7:19 PM	MCB-DCFIF
		7:04 PM	MCB-PSM
Monday, 29 March 2021	Monday, 29 March 2021	7:02 PM	PIF
		6:55 PM	PCMF
		6:51 PM	ALHISF
		7:22 PM	PIEF
		7:24 PM	MCB-PAAF
		7:06 PM	MCB-CMOP
		7:07 PM	ALHIIF
		7:21 PM	ALHAAF
		7:03 PM	MCB-PSF
		7:16 PM	PCF
		7:35 PM	MCB-DCFIF
		7:19 PM	MCB-PSM
Tuesday, 30 March 2021	Tuesday, 30 March 2021	7:26 PM	PIF
		6:53 PM	PCMF
		7:28 PM	PIEF
		7:30 PM	MCB-PAAF
		7:32 PM	MCB-CMOP
		7:33 PM	ALHIIF
		7:27 PM	ALHAAF
		7:39 PM	MCB-PSF
		7:34 PM	PCF
		10:46 AM	ALHIAAP-II
	Wednesday, 31 March 2021	7:47 PM	MCB-DCFIF
Wednesday, 31 March 2021	Wednesday, 31 March 2021	7:01 PM	MCB-PSM
		9:14 PM	PIF
		7:46 PM	PCMF
		7:44 PM	PIEF
		7:08 PM	MCB-PAAF
		8:06 PM	MCB-CMOP
		8:18 PM	ALHIIF
		7:00 PM	MCB-PSF
		8:19 PM	PCF
		1:24 AM	ALHAAF
	Thursday, 1 April 2021	1:46 PM	ALHIAAP-II
		10:55 AM	ALHDDF