



May 19, 2026

TL2026/0519/1A

Muhammad Aurangzeb
Federal Minister for Finance and Revenue
Islamabad

Subject: Transparency International Pakistan has noted from Press Reporting on Violation of PPRA Rules 2004 in the Award of Contracts for International underwriters, lead managers, bookrunners, financial adviser to Commercial Banks for Sovereign Bonds

Dear Sir,

Transparency International Pakistan has noted from press reporting on violation of PPRA Rules 2004 in the award of contract for international underwriters, lead managers, bookrunners, financial adviser to commercial banks for sovereign bonds (**Annex-A**).

The complainant has made the following allegations:

1. The Ministry of Finance has awarded advisory and arranger mandates for multiple sovereign financing transactions (syndicated loan, Eurobond and Panda Bond) to commercial banks without open, competitive procurement process.
2. The \$1 billion syndicated term finance facility was issued in June 2025 and HBL was appointed as arranger without competitive selection process. Arranger fees on a facility of \$1 billion at standard market rates of 1-2% is equivalent to \$10 – 20 million, paid by the federal government.
3. In the USD750 million Eurobond (April 2026), Standard Chartered was appointed sole bookrunner without competitive procurement process. The underwriting fee at prevailing market rates is equivalent to between \$7.5 - \$15 million.
4. The Panda Bond was issued in May 2026 and HBL was appointed as financial adviser to the Government of Pakistan. Advisory and underwriting fees at standard market rates are between \$5 - \$10 million.
5. The total fee exposure across all three sovereign financing transactions range between \$22 million to \$45 million, payable through public funds.
6. All three appointments were made without open, transparent, and competitive procurement process as required under PPRA Rules 2004 for the hiring of financial advisors.
7. The Ministry of Finance has not made public any tender notice, RFP, bid evaluation report, or contract award information relating to the appointment of the financial advisers in contravention to PPRA Rules 2004.

Transparency International Pakistan Comments

Transparency International Pakistan has reviewed the allegations of the complaint, prima facie the allegations seem correct.



Following are TI Pakistan's comments:

1. The Public Procurement Regulatory Authority (PPRA) Rules 2004 provide a framework for the procurement of consultancy and advisory services in accordance with the principles of transparency, fairness, and competitive procurement. Accordingly, the appointment of financial advisers, arrangers, bookrunners, lead managers, and transaction advisers for sovereign bond issuances and sovereign financing transactions falls within the ambit of the PPRA Rules.
2. The Ministry of Finance must determine if the open tendering process for the appointment of commercial banks was adopted in three sovereign financing transactions namely (syndicated loan, Eurobond and Panda Bond). If the complainant's allegations are correct, then the appointment constitutes mis-procurement under PPRA Rules 2004.
3. It may be noted that the Ministry of Finance has previously utilized publicly advertised procurement processes for sovereign debt-related advisory, underwriting, and bookrunning services.
4. For new appointments, as per PPRA Rule 2004, in April 2026, the MoF has advertised a Request for Proposals (RFP) for the "*Engagement of International Underwriters / Lead Managers / Bookrunners for GMTN Program and Sukuk TCI Program*" (**Annex-B**).
5. Prima facie if the procurements were not made under the PPRA Rules, they are to be considered as mis-procurements according to PPRA Rule 50.

Transparency International Pakistan Recommendations

Transparency International Pakistan requests the Federal Minister Finance and revenue to examine the allegations of the complaint and if found correct, take action in line with applicable rules.

Transparency International Pakistan is striving for across-the-board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

Regards,


Advocate Daniyal Muzaffar,
Trustee/Legal Advisor
Transparency International Pakistan

Copies forwarded for information with request to take action under their mandate to:

1. Advisor to PM, PM House, Islamabad
2. MD, PPRA, Islamabad

Note:

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three member bench in case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

"What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution"

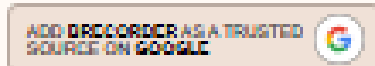
USD2bn sovereign financing deals: PTI condemns 'lack of transparency'

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By Press Release



ISLAMABAD: Pakistan Tehreek-e-Insaf (PTI) strongly condemns the blatant conflict of interest and complete lack of transparency in the award of three major sovereign financing transactions worth nearly USD2 billion under Finance Minister Muhammad Aurangzeb's watch. Independent analysis exposes how the Finance Ministry has repeatedly favoured Habib Bank Limited (HBL) the minister's former employer where he served as CEO and President for six years and Standard Chartered Bank through non-competitive, opaque processes.

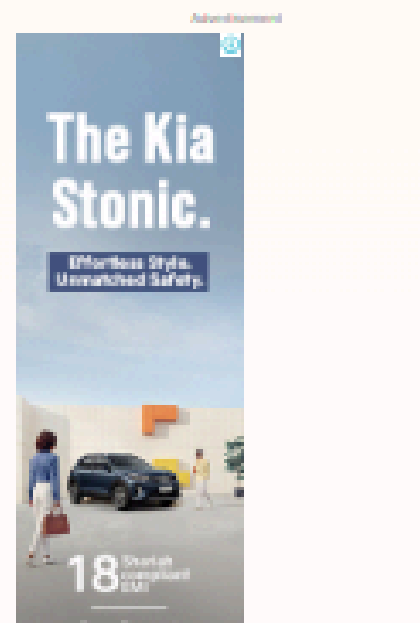
While the masses continue to bear the unbearable burden of inflation, unemployment and skyrocketing utility bills, this government is busy awarding lucrative mandates to connected banks without any disclosed competitive bidding, transparency in fee structures, or accountability. The public has every right to ask: how many millions of dollars in advisory, arranger, and underwriting fees have gone to HBL and its partners at the expense of the national exchequer?

The facts are damning:

Annex A



FOREX	WORLD	COMMODITY
CURRENCY		RATE
USD PKR Interbank Selling / May 19		278.15
USD PKR Interbank Buying / May 19		278.15
USD to Japanese Yen / May 19		159.15
USD to Swiss Franc / May 19		0.73
Pound Sterling to USD / May 19		1.34
Euro to USD / May 19		1.18
SCDR % / May 19		3.58



Debt Management Office
Finance Division
Ministry of Finance
Government of Pakistan
Request for Proposals

Annex B

Engagement of International Underwriters / Lead Managers / Bookrunners for GMTN Program and Sukuk TCI Program

Ministry of Finance (Finance Division), Government of Pakistan intends to renew its Global Medium-Term Note (GMTN) and Sukuk Trust Certificate Issuance(TCI) Program.

For this purpose, the Finance Division seeks to engage the services of international underwriters / lead managers / bookrunners for structuring and execution of the update of the GMTN Programme (for Eurobonds and LCY-denominated USD-settled bonds) and the Sukuk TCI Programme (for international Sukuks), as well as for issuances under these programmes.

Interested bidders are required to register themselves at E-PADS¹ PPRA to access the RFP/bidding documents and other relevant information. The prospective institutions are required to submit their technical and financial proposals online through E-PADS at <http://eprocare.gov.pk>.

Request for Proposal (RFP) along with terms and conditions for bidding can be obtained electronically and can be downloaded from PPRA website, i.e., ppra.gov.pk as well as E-PADS PPRA's website www.eprocure.gov.pk and website of the Ministry of Finance (<https://www.finance.gov.pk/index.html>), free of cost.

The bids / proposals, complete in all respect along with Bid Security Declaration as part of the Technical Proposal, should reach electronically on E-PADS by May 25, 2026 at 4:00 PM PST and will be opened on the same day at 4:30 PM PST through E-PADS. Manual submission of bids is not allowed. In case, the opening of bids falls on local/national holiday, the date of bid closing/opening shall be the next working day on the same time.

The bidders shall be selected in accordance with the Least Cost Based Selection² and the procedures set forth in this RFP.

A duly notarized affidavit will be submitted to the effect that the bidder has not been blacklisted by any Govt/Semi Govt/Autonomous Organization and there is no litigation lying pending adjudication in any Court of Law.

For obtaining any further information or clarifications or query, please contact the undersigned:

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¹International Bidder Registration process. https://drive.google.com/file/d/1SOJLE-CLSiStCVWOhahPRHM10CoHMuv2/view?usp=drive_link