



National Insurance Company Limited

# DIRECTORS' REPORT - 2023

ON THE ANNUAL AUDITED ACCOUNTS FOR THE YEAR ENDED  
DECEMBER 31, 2023



## INTRODUCTION

The Directors of your Company take pleasure in presenting their report together with the audited financial statements and auditors' report thereon for the year ended December 31, 2023. The Director's report prepared under Section 227 of the Companies Act, 2017, the Public Sector Companies (Corporate Governance) Rules, 2013 and the Code of Corporate Governance for Insurers, 2016, will be put forward to the members at the 24<sup>th</sup> Annual General Meeting of the Company to be held on May 13, 2025.

## HISTORY, OBJECTIVES AND THE STATE OF AFFAIRS OF YOUR COMPANY

National Insurance Company Limited ("the Company") was incorporated in Pakistan on March 31, 2000, as an unquoted public limited company under the repealed Companies Ordinance 1984 (now the Companies Act, 2017) through National Insurance Corporation (Reorganization) Ordinance, 2000.

Major Objectives of National Insurance Company Limited include:

- To provide insurance cover to the Government/Semi Government organizations at economical cost;
- To reduce outflow of foreign exchange by reducing dependence on reinsurance abroad;
- To make significant contributions to public exchequer by payment of taxes & dividends; and
- To make prudent investments in public as well as private sector in order to obtain maximum returns.

The Company provides general insurance coverage to the moveable and immoveable assets, liabilities, risks and / or interests belonging to Federal & Provincial Governments, Local Authorities and Statutory Corporations. It has a captive clientele in terms of the provisions of Section 166 of the Insurance Ordinance, 2000.

The Company provides insurance coverage in the following areas:

- |                                    |                            |
|------------------------------------|----------------------------|
| • Fire and Allied Perils           | • Marine Cargo             |
| • Property All Risk                | • Marine Hull              |
| • Machinery Breakdown              | • Aviation Hull            |
| • Contractors' All Risk            | • Bankers Blanket Bond     |
| • Erection All Risk                | • Electronic Equipment     |
| • Business Interruption following; | • Workmen Compensation     |
| ➤ Property Damage                  | • General Public Liability |
| ➤ Machinery Breakdown              | • Cash-in-Safe             |
|                                    | • Cash-in-Transit          |

The Company has never been in loss ever since the year 2000 i.e. when the National Insurance Corporation was converted into a public limited company through the promulgation of the National Insurance Corporation (Reorganization) Ordinance, 2000.

The Company operated smoothly until 2009. Subsequently, certain property-related decisions by the then Board led to governance challenges, resulting in the absence of a properly constituted Board for several years. A short-term Board was appointed in 2013, followed by another in 2015, which successfully cleared pending audits for the years 2010 to 2014. In 2018, a new Board continued this progress by finalizing audits for 2015, 2016, and 2017.

The current Board, constituted on August 8, 2023, has since finalized the audits for 2018 to 2022 and completed the audit for 2023, which is being presented for adoption at the 24th Annual General Meeting on May 13, 2025. The Company has also addressed key compliance areas by appointing a qualified CFO, initiating the recruitment process for a Chief Internal Auditor and Compliance Officer, and ensuring holding of Annual General Meetings. Efforts remain ongoing to strengthen governance through timely financial reporting, policy development, and adherence to regulatory requirements. The Company's Board of Directors and the Management has made every effort to ensure that the Company meets all its statutory obligations including finalization of the accounts, within the earliest possible time. As a result, the Company is able to conclude the audit of accounts for the year under consideration.

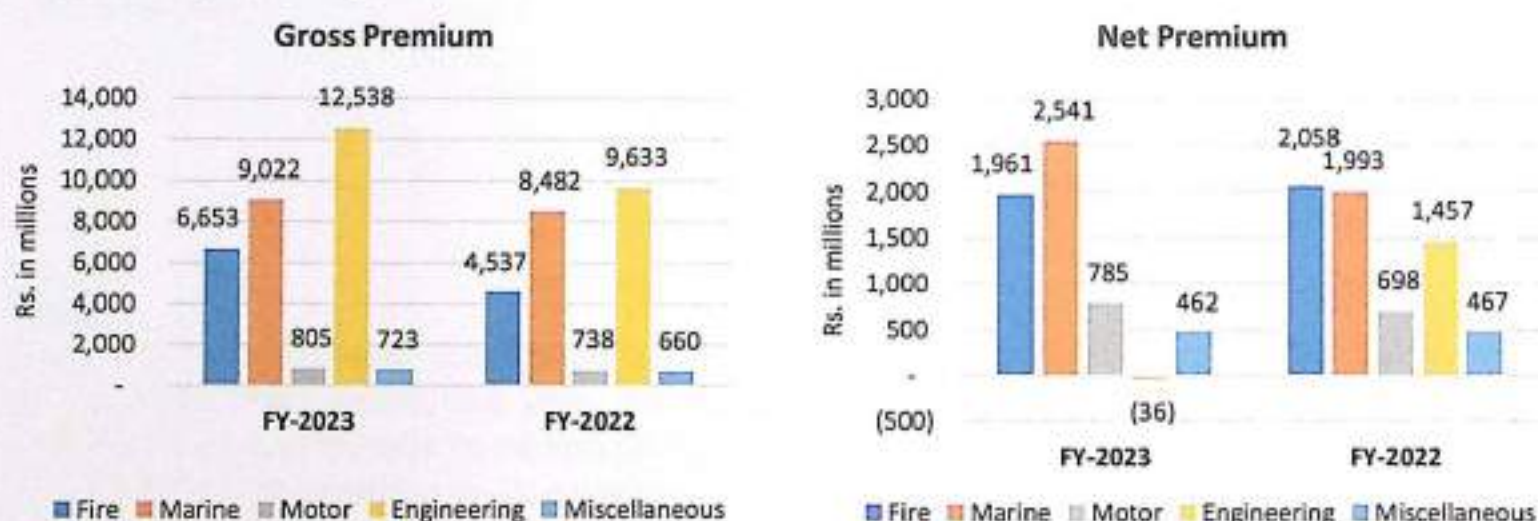
## COMPANY PERFORMANCE REVIEW

Key financial data depicting the business performance of the Company in the year 2023 in comparison with last year (2022) is presented below (all figures are stated in Rupees in millions):

The Company performed well in 2023 as we closed the year delivering sound financial results with a gross written premium growth of 23.67% in business over the preceding year. We continued to follow the strategy of sustainable growth.

In 2023, the gross premium increased to Rs. 29,741.30 million as compared to Rs. 24,049.44 million in 2022. The net insurance premium revenue was 19.21% (Rs. 5,712.88 million) of total gross premium underwritten as compared to the net insurance premium revenue of 27.74% (Rs. 6,672.34 million) in 2022. The net claims ratio for the year 2023 was at 18.48% as compared to last year's ratio of 27.13%. The underwriting results reported a profit of Rs. 2,272.28 million in 2023 as against profit of Rs. 2,956.11 million in the year 2022.

The Gross Written Premium and Net Premium for different classes of business for the year 2023 as compared to previous year, 2022 as below:



*\*Marine includes Marine Cargo, Marine Hull and Aviation*

The return-on-investment portfolio has increased to Rs. 9,847.70 million in 2023 as compared to Rs. 5,452.43 million in 2022. This is due to investment income from Treasury Bills (T-Bills) of Rs. 6,413.69 million. Rental and other income was Rs. 1,092.74 million whereas the same amount was Rs. 1,807.93 million in the preceding year.

Profit before tax amounted to Rs. 11,960.29 million in the year 2023 recorded an increase of 17.52% against the preceding year's profit of Rs. 10,177.35 million. Also, the Profit after tax witnessed an increase of 8.71% to Rs. 8,123.42 million as against profits of Rs. 7,472.38 million in the preceding year.

## PORTFOLIO ANALYSIS

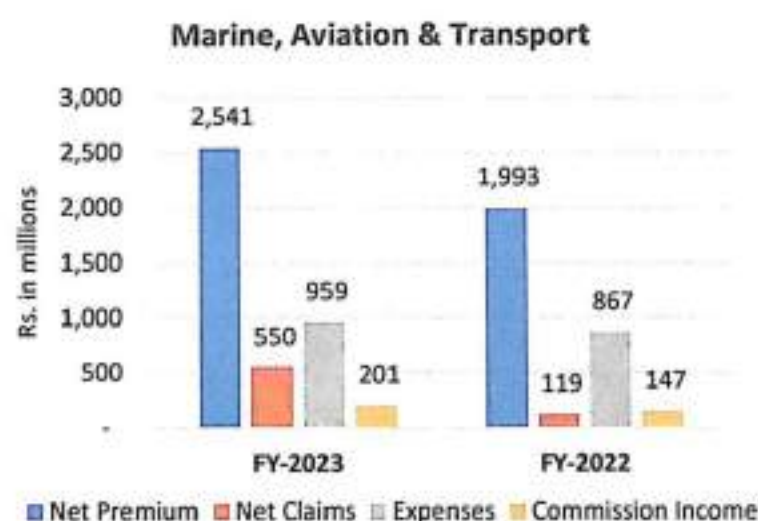
### FIRE AND PROPERTY

Fire and property class of business constituted 22.37% of the total portfolio. During the year, the Company has underwritten a gross premium of Rs. 6,653.20 million (2022: Rs. 4,537.10 million). Net claims to net premium ratio increased to 33.42% in 2023 as compared to -35.66% in 2022. As a result, the fire and property class posted an underwriting profit of Rs. 674.91 million in 2023 as compared to a profit of Rs. 2,369.70 million in 2022.



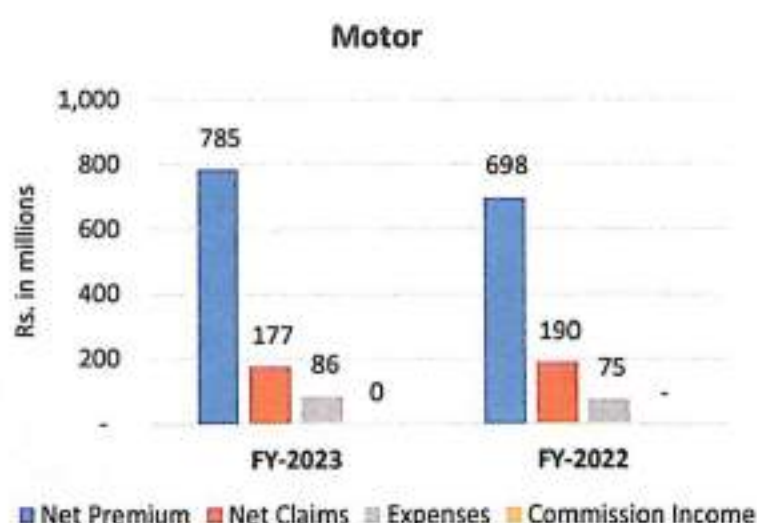
### MARINE, AVIATION & TRANSPORT

Marine, Aviation & Transport class of business constituted 30.34% of the total portfolio. During the year, the Company's underwritten gross premium is Rs. 9,022.10 million (2022: Rs. 8,482.32 million). Net claims to net premium ratio is 21.63% in 2023 as compared to 5.99% in 2022. As a result, this portfolio showed underwriting profit of Rs. 1,233.00 million in 2023 as compared to a profit of Rs. 1,152.57 million in 2022.



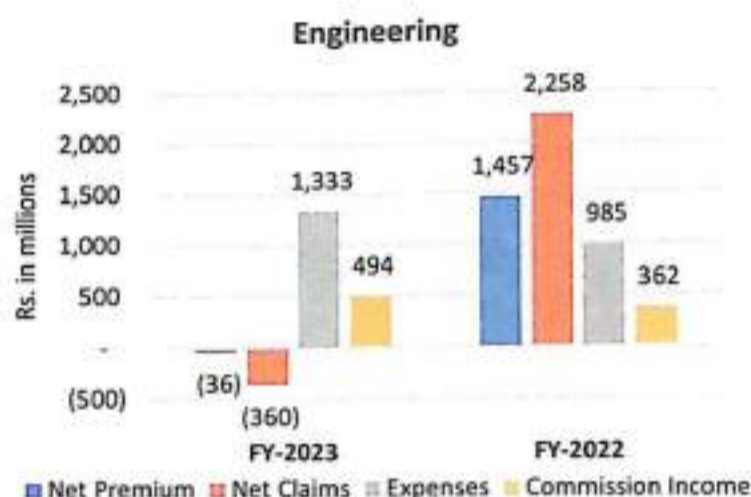
### MOTOR

Motor class of business constituted 2.71% of the total portfolio. During the year, the gross written premium is Rs. 804.56 million (2022: Rs. 737.52 million). Net claims to net premium ratio decreased to 22.54% in 2023 as compared to 27.14% in 2022. As a result, Motor class reported profit of Rs. 522.81 million in 2023 as compared to profit of Rs. 433.49 million in 2022.



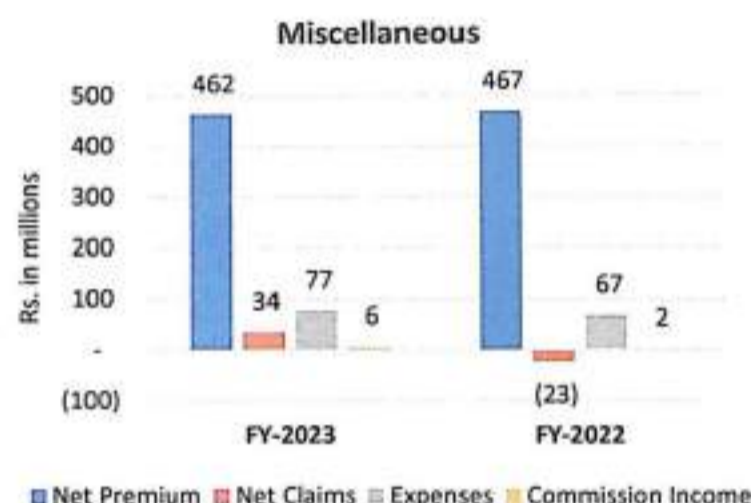
## ENGINEERING

The Engineering class of business constituted 42.16% of the total portfolio. During the year, the gross written premium has increased to Rs. 12,538.40 million (2022: Rs. 9,632.79 million). Net claims to net premium ratio increased to 987.42% in 2023 as compared to 155.02% in 2022. As a result, this portfolio showed an underwriting loss of Rs. 515.70 million (2022: loss of Rs. 1,424.03 million).



## MISCELLANEOUS

The Miscellaneous class of business constituted 2.43% of the total portfolio. During the year, the Company has underwritten a gross premium of Rs. 723.06 million (2022: Rs. 659.71 million). Net claims to net premium ratio increased to 7.39% in 2023 as compared to -4.92% in 2022. As a result, this portfolio showed an underwriting profit of Rs. 357.26 million (2022: profit of Rs. 424.39 million).



## INVESTMENT INCOME

The Investment income of the Company witnessed an increase of 80.61% mainly due to the increase in return on (T-Bills) of 210.46% and increase in gain on sales of 'Held for trading' investments of 581.01% to Rs 778 million. Whereas return on (PIBs) decreased by -27.84%.

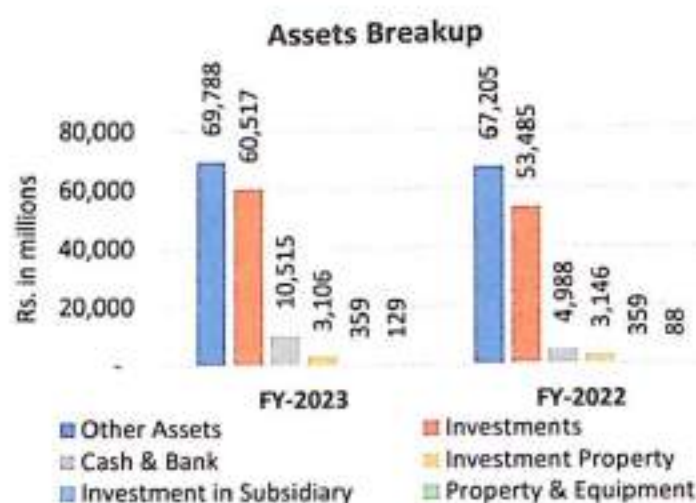
Dividend income decreased by -0.30% and no income on term deposit in 2023. As a result, the overall income from investments amounted to Rs. 9,847.70 million in 2023 as against Rs. 5,452.43 million in 2022.

The break-up of investment income is as under:

| Investment Income  | FY-2023             | FY-2022      |
|--|---------------------|--------------|
|  | (Rupees in million) |              |
| Dividend income  | 418                 | 419          |
| Return on PIBs   | 2,220               | 3,076        |
| Return on T-Bills  | 6,414               | 2,066        |
| Return on term deposits  | -                   | -            |
| (Loss)/Gain on sale of 'Held for trading' investments (Net impairment)   | 778                 | (162)        |
| (Loss)/Gain on sale of 'Available-for-sale' investments (Net impairment) | 17                  | 53           |
| <b>Net Investment Income</b>   | <b>9,848</b>        | <b>5,452</b> |

## COMPANY'S ASSETS

Total assets of the Company as of 31 December 2023 amounted to Rs. 144,415 million as against Rs. 129,271 million in 2022. Total investments increased by 13.15% to Rs. 60,517 million as compared to Rs. 53,485 million in 2022. The management's strategy is to optimize utilization of funds over a long-term investment horizon to maximize investment returns.



## KEY OPERATIONAL AND FINANCIAL DATA

(Figures in Rs. million)

| Description           | FY-2018 | FY-2019 | FY-2020 | FY-2021 | FY-2022 | FY-2023 |
|-----------------------|---------|---------|---------|---------|---------|---------|
| Gross Written Premium | 8,990   | 11,814  | 16,596  | 21,496  | 24,049  | 29,741  |
| Net Written Premium   | 3,561   | 3,952   | 4,315   | 5,063   | 6,672   | 5,713   |
| Net Claims            | 768     | 974     | 774     | 733     | 1,810   | 1,056   |
| Underwriting Profit   | 1,593   | 1,825   | 2,095   | 2,621   | 2,956   | 2,272   |
| Investment income     | 1,403   | 3,185   | 3,889   | 3,808   | 5,452   | 9,848   |
| Profit Before Tax     | 4,416   | 4,727   | 6,345   | 7,042   | 10,177  | 11,960  |
| Income Tax Expense    | 1,555   | 1,242   | 1,950   | 2,304   | 2,704   | 3,837   |
| Profit After Tax      | 2,861   | 3,485   | 4,394   | 4,738   | 7,472   | 8,123   |
| Total Equity          | 30,837  | 35,215  | 39,836  | 43,827  | 50,520  | 59,551  |
| Total Liability       | 21,654  | 28,390  | 29,470  | 45,160  | 78,751  | 84,863  |
| Dividend              | 410     | 500     | 500     | 500     | 700     | 700     |
| Total Investments     | 27,757  | 38,988  | 43,660  | 47,216  | 53,485  | 60,517  |

## BOARD OF DIRECTORS

NICL remained functional without the Board of Directors till Aug 2023. The previous three-year term of the Board of Directors was completed on 30<sup>th</sup> May 2021.

## DIRECTORS' REMUNERATION

The remuneration of the directors is approved by the Board. However, no director takes part in deciding his own remuneration. The Company pays remuneration to directors for attending the meetings of the Board of Directors and its Committees.

The remuneration paid to directors for attending meetings of the Board of Directors as well as its committees has been disclosed in Note 34 to the financial statements.

# DIRECTORS' REPORT - 2023



## BOARD MEETINGS & ATTENDANCE

During the year 2023, 02 meetings of the Board of Directors were held and attended by the Directors as under:

| Directors                    | Meetings Attended |
|------------------------------|-------------------|
| Mr. Ali Syed                 | 2                 |
| Syed Hamid Ali               | 2                 |
| Mr. Shahid Sattar            | 2                 |
| Mr. Muhammad Jaffer Ali Raza | 2                 |
| Mr. Abid Sattar              | 2                 |
| Sahibzada Rafat Raouf Ali    | 2                 |
| Dr. Aftab Imam               | 2                 |
| Dr. Iftikhar Amjad           | 2                 |
| Mr. Khalid Hamid             | 2                 |

## BOARD COMMITTEES & ITS MEMBERS

The Board has formed the following committees:

### AUDIT COMMITTEE

| NAME                         | CATEGORY  |
|------------------------------|-----------|
| Sahibzada Rafat Raouf Ali    | Chairman  |
| Syed Hamid Ali               | Member    |
| Mr. Shahid Sattar            | Member    |
| Mr. Muhammad Jaffer Ali Raza | Member    |
| Dr. Aftab Imam               | Member    |
| Company Secretary            | Secretary |

### ETHICS, HUMAN RESOURCE & REMUNERATION COMMITTEE

| NAME                      | CATEGORY  |
|---------------------------|-----------|
| Mr. Shahid Sattar         | Chairman  |
| Syed Hamid Ali            | Member    |
| Sahibzada Rafat Raouf Ali | Member    |
| Mr. Khalid Hamid          | Member    |
| Company Secretary         | Secretary |

### INVESTMENT COMMITTEE

| NAME              | CATEGORY  |
|-------------------|-----------|
| Mr. Abid Sattar   | Chairman  |
| Dr. Aftab Imam    | Member    |
| Mr. Khalid Hamid  | Member    |
| Company Secretary | Secretary |

### PROCUREMENT COMMITTEE

| NAME                         | CATEGORY  |
|------------------------------|-----------|
| Mr. Muhammad Jaffer Ali Raza | Chairman  |
| Mr. Shahid Sattar            | Member    |
| Dr. Iftikhar Amjad           | Member    |
| Mr. Khalid Hamid             | Member    |
| Company Secretary            | Secretary |

## SHAREHOLDING

The Company is 100% owned by Government of Pakistan and working under administrative control of Ministry of Commerce.

| No. of Shareholders | Shareholdings                                       | Total Shares Held  |
|---------------------|---|--------------------|
| -                   | Shareholding from 1 to 100 shares                   | -                  |
| -                   | Shareholding from 101 to 500 shares                 | -                  |
| -                   | Shareholding from 501 to 1,000 shares               | -                  |
| -                   | Shareholding from 1001 to 5,000 shares              | -                  |
| -                   | Shareholding from 5,001 to 10,000 shares            | -                  |
| -                   | Shareholding from 10,001 to 1,000,000 shares        | -                  |
| -                   | Shareholding from 1,000,001 to 10,000,000 shares    | -                  |
| -                   | Shareholding from 10,000,001 to 100,000,000 shares  | -                  |
| 1                   | Shareholding from 100,000,001 to 200,000,000 shares | 200,000,000        |
| 1                   |   | <b>200,000,000</b> |

| Categories of Shareholders  | Share(s) Held | Percentage |
|---|---------------|------------|
| Directors, Chief Executive Officer, and their spouse and minor children       | -             | 0%         |
| Associated Companies, undertakings and related parties                        | -             | 0%         |
| Executives  | -             | 0%         |
| Banks, Development Financial Institutions, Non-Banking Financial Institutions | -             | 0%         |
| Insurance Companies and Takaful Companies                                     | -             | 0%         |
| Modarabas and Mutual Funds  | -             | 0%         |
| Shareholders holding 5% or more   |               |            |
| General Public:   |               |            |
| - Local   | -             | 0%         |
| - Foreign   | -             | 0%         |
| Others:   |               |            |
| - Public Sector Companies and Corporations                                    | -             | 0%         |
| - Federation of Pakistan (In the name of President of Pakistan)               | 200,000,000   | 100%       |
| - NIC Employees Empowerment Trust (NEET)                                      | -             | 0%         |

## SUBSIDIARY COMPANY

M/s. Civic Center Company (Private) Limited ("the subsidiary company") is the only wholly owned subsidiary of the Company. The subsidiary company was incorporated in the year 1994, and at present, it has a paid-up capital of Rs.448.20 million (divided into 44.820 million shares of Rs.10/- each share). The subsidiary company is engaged in the business of rental management and upkeep of its real estate properties / buildings.

## MOST RECENT DEVELOPMENT – SCHEME OF MERGER / AMALGAMATION OF THE COMPANY'S WHOLLY OWNED SUSIDIARY WITH AND INTO THE COMPANY

NICL holds 100% shares of CCCL which is contrary the requirements of sections 14(1) (b) and 15 read with section 200 of The Companies Act, 2017, therefore, SECP has required the change in the shareholding while transferring share(s) in the name of new nominee director(s) who would then also become the shareholder(s) of the CCCL.

As per resolution of the Board of Directors of CCCL, the matter for transfer of share(s) in the name of new nominee Director(s), from the existing shares i.e. 44,820,009, was referred to NICL's Board of Directors for necessary approval and further proceedings.

In pursuance of this, NICL Board of Directors in its 125<sup>th</sup> meeting held on 25<sup>th</sup> July 2024 approved to transfer one share of CCCL to the Chief Executive Officer of National Insurance Company in order to comply with Security Exchange Commission requirement.

## EARNINGS PER SHARE

During the year under review, earnings per share were Rs. 40.62 /- (2022: Rs. 37.36/-). Detailed working has been reported in Note 33 to the Unconsolidated Financial Statements in this regard.

## INTERNAL FINANCIAL CONTROLS AND ITS ADEQUACY

The Board has adopted policies and procedures for ensuring orderly and efficient conduct of its business including adherence to the Company's policies, safeguarding of its assets, prevention and detection of frauds and errors, accuracy and completeness of the accounting records and timely preparation of reliable financial disclosures. The system provides reasonable assurance that adequate control mechanisms have been established within the operational businesses.

The Company's internal control system is commensurate with its size, scale, and complexities of its operations. The Audit Committee of the Board of Directors actively reviews the adequacy and effectiveness of the internal control system and suggests improvements to strengthen the same.

## RECOMMENDATION OF THE AUDIT COMMITTEE

The appointment of external auditors for the year ended December 31, 2020, 2021, 2022 and 2023 was done in 20<sup>th</sup> Annual General Meeting held on September 12, 2024.

No casual vacancy arose with respect to the external auditors for the year 2023.

Other matters considered and / or recommended by the Audit Committee included the following:

- Discussions with external auditors on the issues from the audit and review of the financial statements.
- Communication between the management and external auditors that are ought to have been affecting the progress of audit of financial statements.
- Other matters requiring presence and outcomes of discussions with the external auditors.

## OPINIONS EXPRESSED IN THE AUDITOR'S REPORT AND EXPLANATION

Auditors of the Company for the year ended December 31, 2023, have expressed their opinion on the financial statements for the said period, and an explanation thereto has been given as under:

| S. No. | Audit Opinion  | Explanation  |
|--------|--|--|
| 1      | We were appointed subsequent to the balance sheet date; consequently, we were unable to carry out auditing procedures necessary to obtain adequate assurance regarding the quantities and condition of investment properties and fixed assets appearing in the unconsolidated statement of financial position as at December 31, | This is due to an inherent limitation that the external auditors for the year ended December 31, 2023 were appointed in the year 2024. |



| S. No. | Audit Opinion  | Explanation |
|--------|--|-------------|
|        | 2023 and application of appropriate cut off procedures. We were also unable to review the events subsequent to the balance sheet date till the date of our audit report, which may affect the financial statements. Further, there being no satisfactory alternative audit procedures that we could adopt to obtain sufficient and appropriate audit evidence regarding the objectives of these procedures. Consequently, we are unable to assess the due impact of the adjustments, if any, that may have been identified as a result of such audit procedures on the balances as appearing in the unconsolidated financial statements. |             |

## **DIRECTION / PREPARATION TO HOLD ANNUAL GENERAL MEETING**

On the application(s) made by the Company in terms of Section 147(1) of The Companies Act, 2017, vide letter No.CS.SEC/19<sup>th</sup>, 20<sup>th</sup> AGM/Sec.147-CA/2024 dated August 9, 2024, the Securities and Exchange Commission of Pakistan, vide its letter No.E-0004795 dated August 12, 2024, has intimated that the commission vide Circular No. 07/2024 March 7, 2024 has clarified that the spirit of section 147 of the Companies Act, 2017 is to empower the members/directors of the company to compel it to hold its overdue general meetings with the intervention of Commission. Hence any application under section 147 shall not be entertained by the Commission in case the same is filed on behalf of the company as a company cannot seek direction against itself.

In addition to above, SECP further clarified that, in case the company has held its overdue meeting without invocation of the provision of section 147 of the Companies Act, 2017, such meeting would be considered as valid meetings, if held in accordance with the relevant provisions of the law.

Therefore, as directed by SECP the Company will hold its Annual General Meetings on May 13, 2025, for the years 2023.

## **RECOMMENDATION FOR DIVIDEND**

An interim dividend of Rs. 700 million for the financial year 2023 has been recommended for declaration by the Board Audit Committee and approved by the Board of Directors.

## **STATEMENT OF CORPORATE AND FINANCIAL REPORTING FRAMEWORK**

The Corporate laws, rules and regulations framed there under spell out the overall functions of the Board of Directors of the Company. The Board is fully aware of its corporate responsibilities as envisaged under the Companies Act, 2017, SOE Act 2023, the Code of Corporate Governance for Insurers, 2016 and the Public Sector Companies (Corporate Governance) Rules 2013 (the Codes) and is pleased to give the following statements:

- The financial statements prepared by the Company present fairly its state of affairs, the results of its operation, cash flows and changes in equity. The Company has maintained proper books of accounts as required under The Companies Act, 2017.

- The Company has followed consistently appropriate accounting policies in preparation of the financial statements. Changes, wherever made, have been disclosed, and accounting estimates made are on the basis of prudent and reasonable judgment.
- Financial Statements have been prepared by the Company in accordance with the International Financial Reporting Standards as applicable in Pakistan. The departure therefrom (if any), is disclosed adequately and explained.
- The fundamentals of the Company are strong and there are no doubts about its ability to continue as a going concern.

### **COMPLIANCE WITH PUBLIC SECTOR COMPANIES (CORPORATE GOVERNANCE) RULES, 2013 AND THE CODE OF CORPORATE GOVERNANCE FOR INSURERS, 2016**

Although, the Directors signing and approving this Report along with the financial statements for the year ended December 31, 2023, on the basis of the indemnity to the Board for signing and approving the financial statements / accounts for the year ended December 31, 2023, as elaborated in the "Disclaimer & Indemnity" part given in this Report were not present during the period to which these financial statements relate, however, the present Directors have approved and signed this Report along with the financial statements for the year ended December 31, 2023, and the relevant Statements of Compliance / Non-Compliances, so as to meet the filing requirements as laid down under the law.

Based on the said indemnity to the Board, the Statements of Compliance / Non-compliances under Rule 24 of the Public Sector Companies (Corporate Governance) Rules, 2013 and Clause (lxxvi) or the Code of Corporate Governance for Insurers, 2016 [Clauses (lxxviii) to (lxxx) of the Code of Corporate Governance for Insurers, 2016 have been omitted vide S.R.O.277(1)/2020 dated April 01, 2020; hence, these provisions do not exist as at the date hereof, and accordingly, the Statement of Compliance with Section 11 and Section 12 of the Insurance Ordinance, 2000 is not been presented herewith], has been approved, signed, issued and annexed to these financial statements by the present Board of Directors without assuming any financial and / or legal liability and / or risk of any type or kind whatsoever, as the present Board of Directors was neither present during the period to which these accounts relate nor is the Board in a position to confirm the exact compliance status with respect to the requirements of the Companies Ordinance, 1984 (now the Companies Act, 2017), the Insurance Ordinance, 2000, the Public Sector Companies (Corporate Governance) Rules, 2013 and the Code of Corporate Governance for insurers, 2016.

### **STATEMENT OF COMPLIANCE UNDER SECTION 46(6) OF THE INSURANCE ORDINANCE, 2000**

Just like the Statement of Compliance / Non-Compliances under Rule 24 of the Public Sector Companies (Corporate Governance) Rules, 2013, the Statement of Compliance required under Section 46(6) of the Insurance Ordinance, 2000 is being presented as under:

"In compliance with sub-Section (6) of Section 46 of the Insurance Ordinance, 2000, we, the Board of Directors of M/S. NATIONAL INSURANCE COMPANY LIMITED, bearing insurance registration no. 183 dated 1<sup>st</sup> January, 2002, through the Chairman Board, Chief Executive Officer and two Directors nominated by the Board of Directors to sign the financial statements for the year ended December 31, 2023, hereby make out the statement that:

- a) in our opinion the annual statutory accounts of the Company set out in the forms attached to the statement have been drawn up in accordance with the Insurance Ordinance, 2000 and any rules made thereunder;

- b) the insurer has at all times in the year 2023 complied with the following provisions of the Insurance Ordinance, 2000 and the rules made thereunder relating to:
  - i. the provisions of the Ordinance relating to minimum paid-up share capital requirements;
  - ii. the provisions of the Ordinance relating to minimum solvency requirements;
  - iii. the provisions of the Ordinance relating to the obtaining of reinsurance arrangements.
- c) as at the date of the statement, the insurer continues to be in compliance with the following provisions of the Insurance Ordinance, 2000 and the rules made thereunder relating to:
  - i. the provisions of the Ordinance relating to minimum paid-up share capital requirements;
  - ii. the provisions of the Ordinance relating to minimum solvency requirements;
  - iii. the provisions of the Ordinance relating to the obtaining of reinsurance arrangements."

The abovementioned statement of compliance under Section 46(6) of the Insurance Ordinance, 2000 should not be read in isolation; rather the statement should be read in conjunction with the "Disclaimer & Indemnity" part given in this Report.

### **EXEMPTION FROM THE REQUIREMENT TO PREPARE & FILE CONSOLIDATED STATEMENTS**

The financials for the years 2023 of NICL's subsidiary, Civic Center Company Limited, has not been audited and approved, hence the consolidated financial statements of NICL cannot be prepared for the year 2023.

The reason for non-finalization of accounts of CCCL is due to the absence of the Board of Directors of NICL and Civic Center Company Limited (CCCL) as directors of CCCL are from the directors of NICL.

Therefore, an application was made by the Company in terms of Section 228(7) of the Companies Act, 2017 read with Regulation 5 of the Companies (General Provisions and forms) Regulations, 2018, vide letter No. CS.SEC/Accounts/indemnity/2024/2 dated November 12, 2024, whereby request was made before the Securities and Exchange Commission of Pakistan for issuance of directions for grant of exemption from the requirements of Section 228 of The Companies Act, 2017 concerning the preparation, audit and submission of the consolidated financial statements for the years 2021, 2022, 2023 & 2024. The Securities and Exchange Commission of Pakistan, vide its letter No. ID/PRDD/020-RA/2024/3367 dated December 11, 2024, accorded the requisite exemption from the requirements of Section 228 of the Companies Act, 2017 for the years 2021, 2022, 2023 & 2024.

### **DISCLAIMER AND INDEMNITY**

As mentioned earlier, the present Board of Director of the Company was notified on August 8, 2023 and their first meeting was held on November 13, 2023. At that time, none of the accounts of NICL after the year 2017 were audited nor approved. The previous Board had approved and signed the financial statements for the years 2015, 2016 & 2017 on the basis of the indemnity provided by SECP on 10<sup>th</sup> August 2020.

On the same basis, accordingly, the Insurance Division of SECP was approached vide the Company's letter No. CS.SEC/Accounts/indemnity/2024 dated July 11, 2024, regarding issuance of indemnity to the Board of NICL for signing and approving of accounts of NICL for the years 2018 till 2023, which was responded to by SECP vide its letter No.ID/PRDD/020-RA/2024/3290 dated July 19,



2024. In the light of the said letter from SECP, the Board of Directors of the Company has considered approving, signing and recommending the accounts for the year 2023 for placement before the shareholders in the 24<sup>th</sup> Annual General Meeting to be convened with the permission of SECP in terms of Section 147 of the Companies Act, 2017.

The present Board of Directors has taken initiative to approve and sign these financial statements merely on the basis of the indemnity issued by SECP vide its letter No.ID/PRDD/020-RA/2024/3290 dated July 19, 2024, as the present Board was neither present during the period to which these financial statements relate nor is the Board aware of the circumstances and compliance status of the Company during that period with respect to the requirements of the Companies Ordinance, 1984 (now the Companies Act, 2017), the Insurance Ordinance, 2000, the Public Sector Companies (Corporate Governance) Rules, 2013, and the Code of Corporate Governance for Insurers, 2016. Likewise, the present Directors have approved and signed this Report along with the financial statements for the year ended December 31, 2023, and the relevant Statements of Compliance / Non-compliances, so as to meet the filing requirements as laid down under the law.

Based on the above said indemnity to the Board:

- i. the Statements of Compliance / Non-Compliances have been approved, signed, issued and annexed to these financial statements by the present Board of Directors without assuming any financial and/ or legal liability and/ or risk of any type or kind whatsoever; and
- ii. the approval of the financial statements and / or all statements and notes annexed thereto does not, in any way, mean or constitute approval of transactions carried out during the period to which these accounts relate and earlier.

### COMPLIANCE WITH SECRETARIAL PRACTICES

Secretarial Compliance Certificate under Clause (xxxiii) of the Code of Corporate Governance for Insurers, 2016 duly signed by the Company Secretary is being furnished herewith, as part of the annual financial statements for the year ended December 31, 2023.

### HEALTH, SAFETY AND ENVIRONMENT

We strongly believe in maintaining the highest standards in health, safety and environment to ensure the well-being of the people who work with us as well as of the communities where we operate. The Real Estate Department looks after the real estate properties and matters ancillary to those properties including health safety (hygiene) and security of the buildings and its occupants (including the tenants). However, the nature of the Company's business is such that it is not detrimental to the overall health, safety and environment.

### EMPLOYEES RETIREMENT BENEFITS

Detailed disclosure about deferred liabilities and movements in respect of employees' retirement benefits have been given in Note 21 to the financial statements for the year ended December 31, 2023.

### INTERNAL AUDIT

The Internal Audit Department has been made functional in the year 2020 by hiring a qualified Chartered Accountant as Chief Internal Auditor with a reporting line to Board Audit Committee. Subsequently, the Internal Audit Manual has been developed and approved by the Board of Directors. According to the said manual, a risk based Internal Audit Plan has been developed and implemented. Resultantly, Internal Audit Reports were presented to the Board Audit Committee. Before the year 2020, the Internal Audit Department was not fully functional. The Internal Audit

Department used to perform pre-audit of all vouchers / transactions to be carried out before any payment was to be made.

### FINANCIAL STATEMENTS

The financial statements prepared by the management of the Company, fairly present its state of affairs, the results of its operations, cash flows and changes in equity, as opined by the external auditors in their report thereon.

### BOOKS OF ACCOUNTS

The Company has maintained proper books of account, as opined by the external auditors in their report thereon.

### ACCOUNTING POLICIES

Appropriate accounting policies have been consistently applied in preparation of financial statements and accounting estimates are based on reasonable and prudent judgment, as opined by the external auditors in their report thereon.

### INTERNATIONAL ACCOUNTING STANDARDS

International Accounting Standards, as applicable in Pakistan, have been followed in preparation of financial statements, as opined by the external auditors in their report thereon.

### INTERNAL CONTROL SYSTEM

The system of internal control is evolving across the Company, and the present Board is painstakingly getting the policies developed by professional consultants so that the policies are approved and implemented in line with the best practices. Moreover, the present Board of Directors is in process of appointing a professionally qualified person to act as the Chief Internal Auditor. Many other initiatives are being taken to strengthen the internal control system across the Company.

### GOING CONCERN

There is no doubt about the Company's ability to continue as a going concern, and hence, the financial statements for the year ended December 31, 2023 have been accordingly made.

### TAXES AND LEVIES

Information about taxes and levies is given in Note 32 to the financial statements for the year ended December 31, 2023.

### STATUTORY PAYMENTS

There are no statutory payments on account of taxes, duties, levies and charges which are outstanding as at 31 December 2023, except those disclosed in the financial statements.

### TRANSACTIONS WITH RELATED PARTIES

Detailed disclosure on transactions with related parties is given in Note 35 to the financial statements for the year ended December 31, 2023.

### COMMUNICATION

Communication with the shareholders is given a high priority. Financial statements / Annual reports are circulated to the members and are also uploaded onto the website of the Company ([www.nicl.com.pk](http://www.nicl.com.pk)), as and when they are adopted by the AGM. Once the outstanding accounts are approved by the Board and adopted by the shareholders at the respective Annual General Meetings, the Company shall ensure that all half yearly and quarterly reports are also circulated, as per the requirement of the law, and also placed on Company's website within the time specified by the



Companies Act, 2017. The Company has a website, [www.nicl.com.pk](http://www.nicl.com.pk), which contains information on Company's activities and financial reports.

### NON-ADJUSTING EVENTS & COMMITMENTS

As per External Auditors, there were no non-adjusting material events which need disclosure in the Financial Statement for the year ended December 31, 2023. Further, detail disclosure about contingencies & commitments has been given in Note 22 to the financial statements for the year ended December 31, 2023.

### SAFEGUARDING OF RECORDS

The Company emphasizes storage and safe custody of its financial records. The Company is using oracle-based GIS system for recording its financial information. Access to electronic documentation has been ensured through implementation of comprehensive password protected authorization matrix. Also, the digitization of records as well as of files has been achieved to ensure that the records are present in physical as well as in digital form.

### WHISTLEBLOWER POLICY

The Company has Whistleblower Policy in place.

### CODE OF CONDUCT

The Company has prepared a 'Code of Conduct', which has been approved by the Board of Directors. This Code has been disseminated throughout the Company. The basic philosophy underlying this Code is to conduct business operations with honesty, integrity and openness, and with respect for human rights and the interests of the employees. The Company respects the legitimate interest of all those with whom it has a relationship - government, employees, clients, shareholders and other stakeholders. The Code has been placed on Company's website.

### PRINCIPAL RISKS AND UNCERTAINTIES

Risks associated with the Company and its business have been discussed in Note 38 to the financial statements for the year ended December 31, 2023.

### AUDITORS

The Auditors, M/s. RSM Avais Hyder Liaquat Noman, Chartered Accountants for the year ended December 31, 2023, have been given satisfactory rating under the Quality Control Review Program of the Institute of Chartered Accountants of Pakistan (ICAP). The external auditors have confirmed that their firm is in compliance with the International Federation of Accountants (IFAC) guidelines on code of ethics as adopted by the ICAP. The external auditors have not been appointed to provide other services except in accordance with the provisions of the Companies Act, 2017 and the Insurance Ordinance, 2000, and they have confirmed that they have observed IFAC guidelines in this respect.

The external auditors attended those Audit Committee meetings in which audited / reviewed financial statements of the Company were considered by the Audit Committee. It may be noted that the financial statements for the period ended December 31, 2023 were neither audited by the external auditors nor approved by the Board of Directors during the year 2023 in the relevant year. The auditors have confirmed that they have no issue of independence, and they have already reported all their concerns in the Board letter. Audit Committee & Board has recommended appointment and remuneration of the external auditors for consideration of the Board in the year 2024 for the years 2020, 2021, 2022 and 2023. They are appointed for the said years in the 20<sup>th</sup> AGM held on September 12, 2024.

## DIRECTORS' REPORT - 2023



### ACKNOWLEDGEMENT

The present board of directors has been endeavoring to make all out efforts and strengthening the internal control system of the company and also upgrade the overall working of the company through technological advancements, digitization of systems, employees' skill and capacity development and moving forward towards more competitive approach.

The Board of Directors of the Company are thankful to the management as well as the regulators for the support and cooperation as without which the Company would not have achieved the finalization of these financial statements and other initiatives taken by the Board of Directors of the Company.

The Company would also like to thank its shareholders for the confidence they have shown in us. We express our sincere thanks to our customers, employees, strategic partners, vendors and suppliers.

We also appreciate the continuing support and guidance provided by the Securities and Exchange Commission of Pakistan during the year.

For and on behalf of the Board.

  
Director  
Karachi

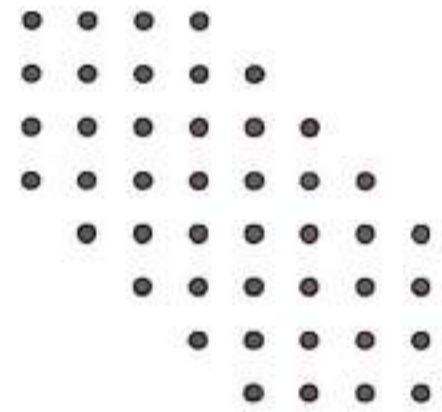
  
Chief Executive Officer



نیشنل انشورنس کمپنی لمیٹڈ

ڈائریکٹر ز رپورٹ 2023

31 دسمبر 2023 کو اختتام پذیر ہونے والے سال کیلئے سالانہ آڈٹ شدہ مالیاتی گوشوارے



### تعارف:

کمپنی کے ڈائریکٹرز 31 دسمبر 2023 کو اختتام پذیر ہونے والے سال کے لیے آڈٹ شدہ مالیاتی گوشواروں اور اس کے ساتھ آڈیٹرز کی رپورٹ بمعہ اپنی رپورٹ پیش کرتے ہوئے پُرسرت ہیں۔ یہ رپورٹ کمپنیز ایکٹ، 2017 کے سیکشن 227 کے مطابق تیار کی گئی ہے۔ پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) رولز 2013، اور کوڈ آف کارپوریٹ گورننس برائے بیمہ کنندگان 2016، مورخہ 13 مئی 2025 کو طے شدہ 24 ویں سالانہ عام اجلاس میں اراکین کو پیش کیا جائے گا۔

### کمپنی کی تاریخ، مقاصد اور معاملات:

نیشنل انشورنس کمپنی لمیٹڈ ("کمپنی") پاکستان میں 31 مارچ 2000 کو منسوخ شدہ کمپنیز آرڈیننس، 1984 (اب کمپنیز ایکٹ، 2017 کے زیر انتظام) کے تحت ایک غیر فہرست شدہ پبلک لمیٹڈ کمپنی کے طور پر قائم کی گئی تھی۔ یہ نیشنل انشورنس کارپوریشن (تنظیم نو) آرڈیننس، 2000 کے ذریعے تشکیل دی گئی تھی۔

### نیشنل انشورنس کمپنی لمیٹڈ کے اہم مقاصد میں شامل ہیں:

- سرکاری اور نیم سرکاری اداروں کو کم قیمت پر انشورنس کوریج فراہم کرنا۔
- بیرون ملک سے ری انشورنس پر انحصار کم سے کم کر کے زر مبادلہ کے اخراج کو کم کرنا۔
- ٹیکسوں اور منافع کے ذریعے سرکاری خزانے میں نمایاں حصہ ڈالنا۔
- زیادہ سے زیادہ منافع حاصل کرنے کے لیے سرکاری اور نجی دونوں شعبوں میں دانشمندانہ سرمایہ کاری کرنا۔

کمپنی منقولہ اور غیر منقولہ دونوں اثاثوں، واجبات، خطرات، اور وفاقی اور صوبائی حکومتوں، مقامی اتھارٹیز، اور قانونی کارپوریشنز کے مفادات کے لیے عمومی انشورنس کوریج پیش کرتی ہے۔ اس کاسٹریٹس بنیادی طور پر انشورنس آرڈیننس 2000 کے سیکشن 166 کی دفعات کے مطابق محفوظ ہے۔

- |  |                      |
|--|----------------------|
| • آگ اور اس سے متعلقہ خطرات                | • میرین کارگو        |
| • جائیداد کے تمام خطرات                    | • میرین بل           |
| • مشینری کی خرابی                          | • ایوی ایشن بل       |
| • ٹھیکیداروں کے تمام خطرات                 | • بینکرز بلینٹ بانڈ  |
| • تنصیب کے تمام خطرات                      | • الیکٹرانک آلات     |
| • کاروباری قسط درج ذیل وجوہات کی بنیاد پر: | • ورک مین کمپنیشن    |
| ➤ پراپرٹی کا نقصان                         | • جزل پبلک لائیبلیٹی |
| ➤ مشینری کی خرابی                          | • نقدی برائے حفاظت   |
|  | • نقدی برائے ترسیل   |

سال 2000 میں پبلک لمیٹڈ کمپنی میں تبدیل ہونے کے بعد سے، نیشنل انشورنس کارپوریشن (ری آرگنائزیشن) آرڈیننس 2000 کے نفاذ کے ذریعے، کمپنی مسلسل منافع بخش رہی ہے اور اسے کبھی خسارہ نہیں ہوا۔

کمپنی کا انتظام 2009 تک بخوبی چلتا رہا۔ بعد ازاں اُس وقت کے بورڈ کی جانب سے جائیداد سے متعلق بعض فیصلوں کے باعث نظم و نسق میں پیچیدگیاں پیدا ہوئیں، جس کے نتیجے میں کئی برسوں تک باقاعدہ بورڈ کا قیام عمل میں نہ آسکا۔ 2013 میں ایک عبوری بورڈ تعینات کیا گیا، جس کے بعد 2015 میں نیا بورڈ تشکیل دیا گیا جس نے 2010 سے 2014 تک کے زیر التواء آڈٹس کامیابی سے مکمل کیے۔ 2018 میں آنے والے بورڈ نے اس تسلسل کو برقرار رکھتے ہوئے 2015، 2016 اور 2017 کے آڈٹس بھی مکمل کر لیے۔

موجودہ بورڈ، جو 8 اگست 2023 کو تشکیل دیا گیا، نے 2018 سے 2022 تک کے آڈٹس کو حتمی شکل دے دی ہے اور سال 2023 کا آڈٹ بھی مکمل کر لیا ہے، جو کہ 13 مئی 2025 کو ہونے والی 24 ویں سالانہ جنرل میٹنگ میں منظوری کے لیے پیش کیا جا رہا ہے۔ کمپنی نے اہم تعمیلی تقاضوں کو پورا کرنے کے لیے ایک مستند چیف فنانشل آفیسر (CFO) کی تقرری کی ہے، چیف انٹرئل آڈیٹر اور کسٹڈین آفیسر کی تقرری کا عمل شروع کیا ہے، اور سالانہ جنرل میٹنگز کے انعقاد کو یقینی بنایا ہے۔ مالیاتی رپورٹس کی بروقت تیاری، پالیسی سازی، اور ریگولیٹری تقاضوں کی پاسداری کے ذریعے کارپوریٹ نظم و نسق کو مضبوط بنانے کی کوششیں جاری ہیں۔ کمپنی کے بورڈ آف ڈائریکٹرز اور انتظامیہ نے ہر ممکن کوشش کی ہے کہ تمام قانونی ذمہ داریاں، بالخصوص مالیاتی حسابات کی بروقت تکمیل، جلد از جلد مکمل کی جائیں۔ اس کے نتیجے میں کمپنی زیر غور سال کے مالیاتی گوشواروں کے آڈٹ کو مکمل کرنے میں کامیاب ہوئی ہے۔

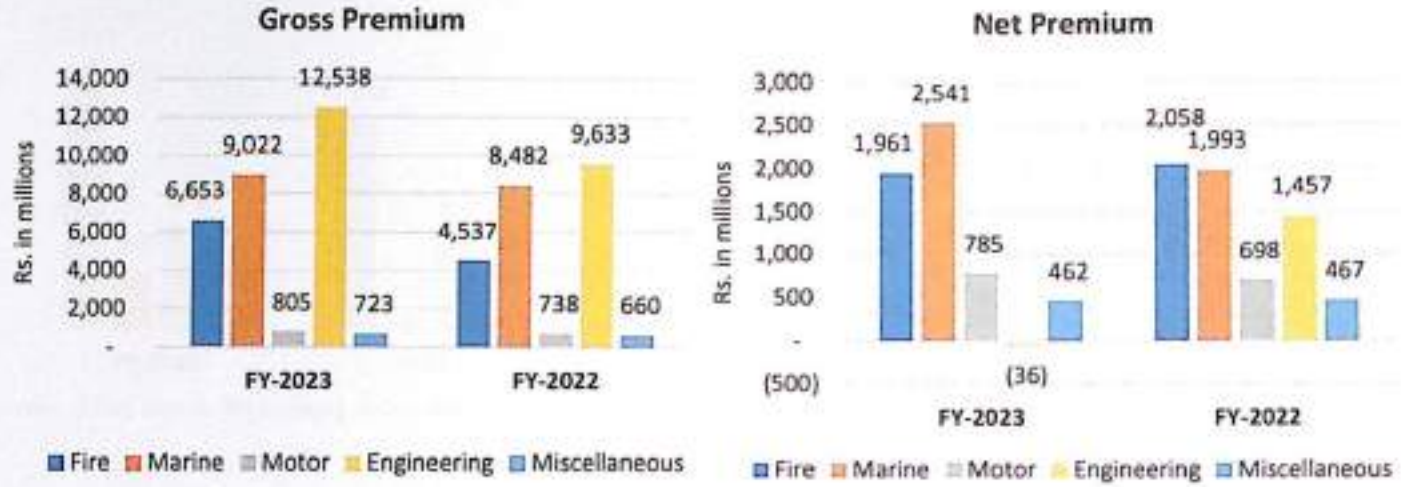
## کمپنی کی کارکردگی کا جائزہ:

سال 2023 میں کمپنی کی کاروباری کارکردگی کی عکاسی کرنے والے اہم مالیاتی اعداد و شمار گزشتہ سال 2022 کے ساتھ تقابلی طور پر درج ذیل ہیں (تمام اعداد و شمار روپے میں، ملین کے حساب سے بیان کیے گئے ہیں):

سال 2023 میں کمپنی کی کارکردگی مثبت رہی، اور سال کے اختتام پر مضبوط مالی نتائج حاصل کیے گئے، جن میں مجموعی تحریری پریمیم میں گزشتہ سال کے مقابلے میں 23.67 فیصد کا نمایاں اضافہ دیکھا گیا۔ کمپنی نے پائیدار ترقی کی حکمت عملی کو برقرار رکھا۔

سال 2023 میں مجموعی پریمیم بڑھ کر 29,741.30 ملین روپے ہو گیا، جبکہ 2022 میں یہ 24,049.44 ملین روپے تھا۔ سال 2023 میں خالص انشورنس پریمیم آمدنی، کل تحریر کردہ پریمیم کا 19.21 فیصد (5,712.88 ملین روپے) رہا، جبکہ 2022 میں یہ آمدنی کل پریمیم کا 27.74 فیصد (6,672.34 ملین روپے) تھا۔ سال 2023 میں خالص کلیمز کا تناسب 18.48 فیصد رہا، جبکہ گزشتہ سال یہ تناسب 27.13 فیصد تھا۔ انڈر رائٹنگ نتائج کے طور پر 2023 میں 2,272.28 ملین روپے کا منافع حاصل ہوا، جبکہ 2022 میں یہ منافع 2,956.11 ملین روپے تھا۔

سال 2023 میں مختلف کاروباری شعبوں کے لیے مجموعی تحریری پریمیم اور خالص پریمیم کا گزشتہ سال 2022 کے مقابلے میں موازنہ درج ذیل ہے:



\*میرین میں میرین کارگو، میرین ہل اور ایوی ایشن شامل ہیں۔

سرمایہ کاری سے حاصل شدہ منافع کی مالیت 2023 میں بڑھ کر 9,847.70 ملین روپے ہو گئی، جبکہ 2022 میں یہ رقم 5,452.43 ملین روپے تھی۔ اس اضافے کی بڑی وجہ ٹریژری بلز (T-Bills) سے حاصل شدہ 6,413.69 ملین روپے کی آمدنی ہے۔ کرایہ اور دیگر آمدنی سال 2023 میں 1,092.74 ملین روپے رہی، جبکہ گزشتہ سال یہ آمدنی 1,807.93 ملین روپے تھی۔ سال 2023 میں قبل از ٹیکس منافع 11,960.29 ملین روپے رہا، جو کہ گزشتہ سال کے 10,177.35 ملین روپے کے مقابلے میں 17.52 فیصد اضافہ ظاہر کرتا ہے۔ اسی طرح، بعد از ٹیکس منافع بھی 8.71 فیصد بڑھ کر 8,123.42 ملین روپے ہو گیا، جو کہ گزشتہ سال 2022 میں 7,472.38 ملین روپے تھا۔

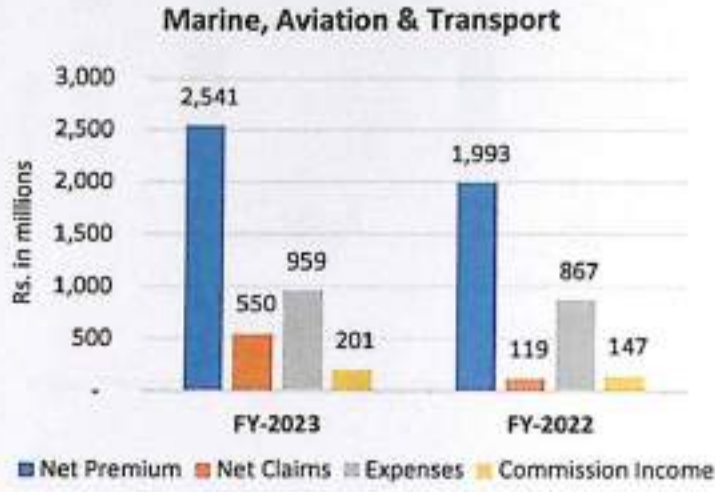
## پورٹ فولیو تجزیہ:

### آگ اور املاک:



آگ اور املاک کے کاروباری شعبے کا مجموعی پورٹ فولیو میں 22.37 فیصد حصہ رہا۔ سال کے دوران، کمپنی نے 6,653.20 ملین روپے کا مجموعی پریمیم انڈر رائٹ کیا، جو 2022 میں 4,537.10 ملین روپے تھا۔ خالص کلیمز اور خالص پریمیم کا تناسب 2022 میں 35.66 فیصد تھا، جو 2023 میں بڑھ کر 33.42 فیصد ہو گیا۔ نتیجتاً، آگ اور املاک کے شعبے نے 2023 میں 674.91 ملین روپے کا انڈر رائٹنگ منافع حاصل کیا، جو 2022 میں 2,369.70 ملین روپے تھا۔

**میرین، ایوی ایشن اینڈ ٹرانسپورٹ:**



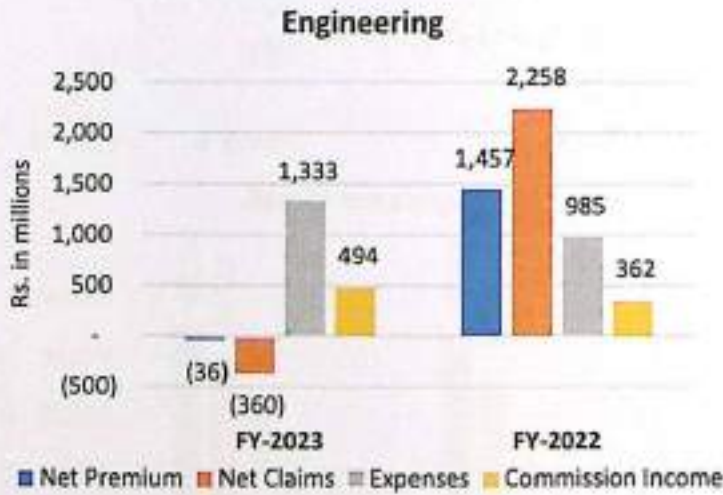
میرین، ایوی ایشن اور ٹرانسپورٹ کے کاروباری شعبے کا مجموعی پورٹ فولیو میں 30.34 فیصد حصہ رہا۔ سال کے دوران، کمپنی نے اس شعبے میں 9,022.10 ملین روپے کا مجموعی پریمیم انڈر رائٹ کیا، جو 2022 میں 8,482.32 ملین روپے تھا۔ خالص کلیئرز اور خالص پریمیم کا تناسب 2022 میں 5.99 فیصد تھا، جو 2023 میں بڑھ کر 21.63 فیصد ہو گیا۔ نتیجتاً، اس پورٹ فولیو نے سال 2023 میں 1,233.00 ملین روپے کا انڈر رائٹ منافع حاصل کیا، جو 2022 میں 1,152.57 ملین روپے تھا۔

**موٹر:**



موٹر کے کاروباری شعبے کا مجموعی پورٹ فولیو میں 2.71 فیصد حصہ رہا۔ سال کے دوران، اس شعبے میں مجموعی پریمیم 804.56 ملین روپے انڈر رائٹ کیا گیا، جو 2022 میں 737.52 ملین روپے تھا۔ خالص کلیئرز اور خالص پریمیم کا تناسب 2022 میں 27.14 فیصد تھا، جو 2023 میں کم ہو کر 22.54 فیصد رہ گیا۔ نتیجتاً، موٹر کے شعبے نے 2023 میں 522.81 ملین روپے کا منافع حاصل کیا، جو 2022 میں 433.49 ملین روپے تھا۔

**انجینئرنگ**



انجینئرنگ کے کاروباری شعبے کا مجموعی پورٹ فولیو میں 42.16 فیصد حصہ رہا۔ سال کے دوران، اس شعبے میں مجموعی پریمیم بڑھ کر 12,538.40 ملین روپے ہو گیا، جو 2022 میں 9,632.79 ملین روپے تھا۔ خالص کلیئرز اور خالص پریمیم کا تناسب 2022 میں 155.02 فیصد تھا، جو 2023 میں بڑھ کر 987.42 فیصد ہو گیا۔ نتیجتاً، اس پورٹ فولیو نے سال 2023 میں 515.70 ملین روپے کا انڈر رائٹ منافع ظاہر کیا، جو 2022 میں 1,424.03 ملین روپے کا نقصان تھا۔



### متفرقات:

متفرق کاروباری شعبے کا مجموعی پورٹ فولیو میں 2.43 فیصد حصہ رہا۔ سال کے دوران، کمپنی نے اس شعبے میں 723.06 ملین روپے کا مجموعی پرمیم انڈر رائٹ کیا، جو 2022 میں 659.71 ملین روپے تھا۔ خالص کلیئر اور خالص پرمیم کا تناسب 2022 میں 4.92 فیصد تھا، جو 2023 میں بڑھ کر 7.39 فیصد ہو گیا۔ نتیجتاً، اس پورٹ فولیو نے سال 2023 میں 357.26 ملین روپے کا انڈر رائٹ منافع حاصل کیا، جو 2022 میں 424.39 ملین روپے تھا۔

### سرمایہ کاری آمدنی

سرمایہ کاری سے حاصل ہونے والی آمدنی کی تفصیلات درج ذیل ہیں:

| آمدنی  | FY-2022 | FY-2023 |
|--|---------|---------|
| ڈیویڈنڈ آمدنی  | 419     | 418     |
| PIBs پر منافع  | 3,076   | 2,220   |
| T-Bills پر منافع   | 2,066   | 6,414   |
| ٹرم ڈپازٹ پر منافع   | -       | -       |
| تجارت کے لیے رکھی گئی سرمایہ کاری کی فروخت پر (خرید) / نفع | (162)   | 778     |
| فروخت کے لیے دستیاب سرمایہ کاری کی فروخت پر (خرید) / نفع   | 53      | 17      |
| مجموعہ   | 5,452   | 9,848   |

کمپنی کی سرمایہ کاری سے حاصل ہونے والی آمدنی میں 80.61 فیصد اضافہ دیکھا گیا، جو بنیادی طور پر ٹریڈری بلز (T-Bills) پر منافع میں 210.46 فیصد اضافے اور 'Held for trading' سرمایہ کاری کی فروخت پر حاصل شدہ منافع میں 581.01 فیصد اضافے (778 ملین روپے) کی وجہ سے ہے۔ دوسری جانب، پاکستان انویسٹمنٹ بانڈز (PIBs) پر حاصل ہونے والا منافع 27.84 فیصد کم ہو گیا۔

ڈیویڈنڈ آمدنی میں بھی 0.30 فیصد کمی ہوئی، اور 2023 میں کسی بھی ٹرم ڈپازٹ پر کوئی آمدنی حاصل نہیں ہوئی۔ نتیجتاً، سال 2023 میں سرمایہ کاری سے حاصل ہونے والی کل آمدنی 9,847.70 ملین روپے رہی، جبکہ 2022 میں یہ 5,452.43 ملین روپے تھی۔



### کمپنی کے اثاثہ جات

31 دسمبر 2023 کو کمپنی کے کل اثاثے 144,415 ملین روپے رہے، جو 2022 میں 129,271 ملین روپے تھے۔ کل سرمایہ کاری میں 13.15 فیصد اضافہ ہوا اور یہ 2023 میں بڑھ کر 60,517 ملین روپے ہو گئی، جبکہ 2022 میں یہ 53,485 ملین روپے تھی۔ انتظامیہ کی

حکمت عملی یہ ہے کہ طویل مدتی سرمایہ کاری کے تناظر میں فنڈز کے مؤثر استعمال کو یقینی بنایا جائے تاکہ سرمایہ کاری پر زیادہ سے زیادہ منافع حاصل کیا جاسکے۔

اہم آپیشل اور مالیاتی تفصیلات:

(اعداد و شمار ملین روپے میں)

| تفصیلات              | FY-2018 | FY-2019 | FY-2020 | FY-2021 | FY-2022 | FY-2023 |
|----------------------|---------|---------|---------|---------|---------|---------|
| مجموعی تحریری بیمہ   | 8,990   | 11,814  | 16,596  | 21,496  | 24,049  | 29,741  |
| خاص تحریری بیمہ      | 3,561   | 3,952   | 4,315   | 5,063   | 6,672   | 5,713   |
| خاص کلیئر            | 768     | 974     | 774     | 733     | 1,810   | 1,056   |
| انڈر رائٹنگ منافع    | 1,593   | 1,825   | 2,095   | 2,621   | 2,956   | 2,272   |
| سرمایہ کاری کی آمدنی | 1,403   | 3,185   | 3,889   | 3,808   | 5,452   | 9,848   |
| قبل از ٹیکس منافع    | 4,416   | 4,727   | 6,345   | 7,042   | 10,177  | 11,960  |
| انکم ٹیکس کا خرچ     | 1,555   | 1,242   | 1,950   | 2,304   | 2,704   | 3,837   |
| بعد از ٹیکس منافع    | 2,861   | 3,485   | 4,394   | 4,738   | 7,472   | 8,123   |
| کل انکوائی           | 30,837  | 35,215  | 39,836  | 43,827  | 50,520  | 59,551  |
| کل قرضہ جات          | 21,654  | 28,390  | 29,470  | 45,160  | 78,751  | 84,863  |
| ڈیویڈنڈ              | 410     | 500     | 500     | 500     | 700     | 700     |
| کل سرمایہ کاری       | 27,757  | 38,988  | 43,660  | 47,216  | 53,485  | 60,517  |

بورڈ آف ڈائریکٹرز:

سال 2023 کے دوران NICL بغیر بورڈ آف ڈائریکٹرز کے اگست 2023 تک کام کرتا رہا۔ بورڈ آف ڈائریکٹرز کی گذشتہ تین سالہ مدت 30 مئی 2021 کو مکمل ہو چکی تھی۔

ڈائریکٹرز کا معاوضہ:

ڈائریکٹرز کا معاوضہ بورڈ کی منظوری سے طے کیا جاتا ہے، تاہم کوئی بھی ڈائریکٹر اپنے ذاتی معاوضے کے فیصلے میں شامل نہیں ہوتا۔ کمپنی، ڈائریکٹرز کو بورڈ آف ڈائریکٹرز اور اس کی کمیٹیوں کے اجلاسوں میں شرکت کے لیے معاوضہ ادا کرتی ہے۔

بورڈ آف ڈائریکٹرز اور اس کی کمیٹیوں کے اجلاسوں میں شرکت کے لیے ادا کیے گئے معاوضے کی تفصیلات مالیاتی گوشواروں کے نوٹ 34 میں درج ہیں۔

## DIRECTORS' REPORT - 2023



بورڈ کے اجلاس اور حاضری:

سال 2023 کے دوران بورڈ آف ڈائریکٹرز کے 2 اجلاس منعقد ہوئے، جن میں ڈائریکٹرز کی شرکت حسب ذیل رہی:

| ڈائریکٹرز              | اجلاس میں شرکت |
|------------------------|----------------|
| جناب علی سید           | 2              |
| سید حامد علی           | 2              |
| جناب شاہد ستار         | 2              |
| جناب محمد جعفر علی رضا | 2              |
| جناب عابد ستار         | 2              |
| صاحبزادہ رفعت رؤف علی  | 2              |
| ڈاکٹر آفتاب امام       | 2              |
| ڈاکٹر افتخار امجد      | 2              |
| جناب خالد حامد         | 2              |

بورڈ کمیٹیاں اور اس کے ممبران:

بورڈ نے درج ذیل کمیٹیاں تشکیل دی ہیں:

آؤٹ کمیٹی:

| نام                    | عہدہ     |
|------------------------|----------|
| صاحبزادہ رفعت رؤف علی  | چیئر مین |
| سید حامد علی           | ممبر     |
| جناب شاہد ستار         | ممبر     |
| جناب محمد جعفر علی رضا | ممبر     |
| ڈاکٹر آفتاب امام       | ممبر     |
| کمپنی سیکرٹری          | سیکرٹری  |

اخلاقیات، انسانی وسائل و معاوضہ کمیٹی:

| نام                   | عہدہ     |
|-----------------------|----------|
| جناب شاہد ستار        | چیئر مین |
| سید حامد علی          | ممبر     |
| صاحبزادہ رفعت رؤف علی | ممبر     |
| جناب خالد حامد        | ممبر     |
| کمپنی سیکریٹری        | سیکریٹری |

سرمایہ کاری کمیٹی:

| نام              | عہدہ     |
|------------------|----------|
| جناب عابد ستار   | چیئر مین |
| ڈاکٹر آفتاب امام | ممبر     |
| جناب خالد حامد   | ممبر     |
| کمپنی سیکریٹری   | سیکریٹری |

پروکیورمنٹ کمیٹی:

| نام                    | عہدہ     |
|------------------------|----------|
| جناب محمد جعفر علی رضا | چیئر مین |
| جناب شاہد ستار         | ممبر     |
| ڈاکٹر افتخار امجد      | ممبر     |
| جناب خالد حامد         | ممبر     |
| کمپنی سیکریٹری         | سیکریٹری |

حصص داری:

کمپنی سو فیصد حکومت پاکستان کی ملکیت ہے اور وزارت تجارت کے انتظامی کنٹرول کے تحت کام کرتی ہے۔

| شیر ہولڈر کی تعداد | شیر ہولڈنگ                                 | کل حامل شیر |
|--------------------|--|-------------|
| -                  | شیر ہولڈنگ 1 سے 100 شیرز تک                | -           |
| -                  | شیر ہولڈنگ 101 سے 500 شیرز تک              | -           |
| -                  | شیر ہولڈنگ 501 سے 1,000 شیرز               | -           |
| -                  | شیر ہولڈنگ 1001 سے 5,000 شیرز              | -           |
| -                  | شیر ہولڈنگ 5,001 سے 10,000 شیرز            | -           |
| -                  | شیر ہولڈنگ 10,001 سے 1,000,000 شیرز        | -           |
| -                  | شیر ہولڈنگ 1,000,001 سے 10,000,000 شیرز    | -           |
| -                  | شیر ہولڈنگ 10,000,001 سے 100,000,000 شیرز  | -           |
| 1                  | شیر ہولڈنگ 100,000,001 سے 200,000,000 شیرز | 200,000,000 |
| 1                  |  | 200,000,000 |

| شیر ہولڈر کی درجہ بندی  | حامل شیرز   | فیصد |
|---|-------------|------|
| ڈائریکٹرز، چیف ایگزیکٹو آفیسر، اور ان کی شریک حیات اور نابالغ بچے | -           | 0%   |
| وابست کمپنیاں، ادارے اور متعلقہ فریق                              | -           | 0%   |
| ایگزیکٹوز   | -           | 0%   |
| بینک، ترقیاتی مالیاتی ادارے، غیر بینکنگ مالیاتی ادارے             | -           | 0%   |
| انشورنس کمپنیاں اور حاکمات کمپنیاں                                | -           | 0%   |
| مدارس اور میوچل فنڈز  | -           | 0%   |
| 5 فیصد یا اس سے زیادہ کے حامل شیر ہولڈرز                          |             |      |
| عام عوام:   |             |      |
| - مقامی   | -           | 0%   |
| - غیر ملکی  | -           | 0%   |
| دیگر:   |             |      |
| - پبلک سیکٹر کمپنیاں اور کارپوریٹیشنز                             | -           | 0%   |
| - فیڈریشن آف پاکستان (صدر پاکستان کے نام پر)                      | 200,000,000 | 100% |
| NIC - ایسپلائز ایسپاورمنٹ ٹرسٹ (NEET)                             | -           | 0%   |

### ذیلی کمپنی:

میسرز سوک سینٹر کمپنی (پرائیویٹ) لمیٹڈ ("ذیلی کمپنی") کمپنی کا واحد مکمل ملکیتی ماتحت ادارہ ہے۔ 1994 میں قائم کیا گیا، ذیلی ادارے کے پاس فی الحال 448.20 ملین روپے کا اداسدہ سرمایہ ہے، جسے 10 روپے فی شیئر کے حساب سے 44.820 ملین شیئرز میں تقسیم کیا گیا ہے۔ ذیلی ادارہ ریئل مینجمنٹ اور اس کی جائیدادوں اور عمارتوں کی دیکھ بھال میں مصروف ہے۔

### حالیہ ڈیپٹمنٹ - انضمام / انضمام کی اسکیم:

سوک سینٹر کمپنی (پرائیویٹ) لمیٹڈ (CCCL) میں NICL کے 100 فیصد شیئرز ہیں۔ ملکیت کا یہ اسٹرکچر کمپنیز ایکٹ 2017 کے سیکشن 200 کے ساتھ پڑھے گئے سیکشن (b)(1) اور 15 کے تقاضوں کے برعکس ہے۔ نتیجتاً، SECP نے شیئر ہولڈنگ کے اسٹرکچر میں تبدیلی کا حکم دیا ہے۔ CCCL کے شیئرز نے نامزد ڈائریکٹرز کو منتقل کر دیے جائیں گے، جو پھر ریگولیٹری تقاضوں کی تعمیل کو یقینی بناتے ہوئے CCCL کے شیئر ہولڈر بن جائیں گے۔

CCCL کے بورڈ آف ڈائریکٹرز کی قرارداد کے مطابق، موجودہ شیئرز سے 44,820,009 کے شیئرز نے نامزد ڈائریکٹرز کو منتقل کرنے کے معاملے کو ضروری منظوری اور مزید کارروائی کے لیے NICL کے بورڈ آف ڈائریکٹرز کو بھیج دیا گیا ہے۔

اس قرارداد کی پیروی میں، NICL کے بورڈ آف ڈائریکٹرز نے 25 جولائی 2024 کو ہونے والے اپنے 125 ویں اجلاس کے دوران، CCCL کا ایک حصہ نیشنل انشورنس کمپنی کے چیف ایگزیکٹو آفیسر کو منتقل کرنے کی منظوری دی۔ یہ کارروائی سیکیورٹیز اینڈ ایکسچینج کمیشن کی ضروریات کو پورا کرنے کے لیے کی گئی ہے۔

### آمدنی فی شیئر:

سال کے لیے فی شیئر آمدنی 40.62 روپے رہی، جو کہ 2022 میں 37.36 روپے تھی۔ تفصیلی حساب کے لیے، براہ کرم غیر مجموعی مالیاتی حسابات کا نوٹ 33 ملاحظہ کریں۔

### انٹرئل مالیاتی کنٹرول اور ان کی مناسبت:

بورڈ نے کاروبار کے منظم اور موثر آپریشن کو یقینی بنانے کے لیے پالیسیوں اور طریقہ کار کو نافذ کیا ہے۔ اس میں کمپنی کی پالیسیوں کی پابندی، اثاثوں کی حفاظت، دھوکہ دہی اور غلطیوں کو روکنا اور ان کا پتہ لگانا، اکاؤنٹنگ ریکارڈ کی درستگی اور مکمل ہونے کو یقینی بنانا، اور قابل اعتماد مالیاتی اعلیٰ افادات کی بروقت تیاری شامل ہے۔ مکمل یقین فراہم نہ کرتے ہوئے، نظام معقول یقین دہانی پیش کرتا ہے کہ آپریشنل کاروباروں کے اندر مناسب کنٹرول میکانزم موجود ہیں۔

کمپنی کے انٹرئل کنٹرول کے نظام کو اس کے سائز، دائرہ کار، اور آپریشنل پیچیدگیوں سے مماثل بنانے کے لیے مناسب طور پر چکانہ بنایا گیا ہے۔ بورڈ آف ڈائریکٹرز کی آڈٹ کمیٹی فعال طور پر اس نظام کی مناسبت اور تاثیر کا جائزہ لیتی ہے اور اسے مزید مضبوط بنانے کے لیے بہتری کی سفارش کرتی ہے۔

### آڈٹ کمیٹی کی سفارش:

آڈٹ کمیٹی کی جانب سے 31 دسمبر 2020، 2021، 2022 اور 2023 کے اختتام پر سالانہ عمومی اجلاس میں ایکسٹرنل آڈیٹرز کی تقرری کی گئی، جو 12 ستمبر 2024 کو منعقد ہوا۔

سال 2023 میں بیرونی آڈیٹرز کے لیے کوئی بھی آسامی خالی نہیں ہوئی۔

آڈٹ کمیٹی نے مندرجہ ذیل پر بھی غور کیا اور / یا سفارش کی:

- مالی بیانات کے آڈٹ اور جائزہ کے دوران جن مسائل کی نشاندہی کی گئی ہے ان کے بارے میں بیرونی آڈیٹرز کے ساتھ بات چیت۔
- انتظامیہ اور بیرونی آڈیٹرز کے درمیان مواصلت جو مالیاتی بیان کے آڈٹ کی پیشرفت کو متاثر کر سکتی ہے۔
- دیگر امور جن کی موجودگی اور بیرونی آڈیٹرز کے ساتھ بات چیت کے نتائج کی ضرورت ہوتی ہے۔

### آڈیٹرز کی رپورٹ اور وضاحت میں اظہار خیال:

31 دسمبر 2023 کو ختم ہونے والے سال کے آڈیٹرز نے اس مدت کے مالیاتی گوشواروں پر اپنی رائے فراہم کی ہے۔ ذیل میں ان کے خیالات کی وضاحت پیش کی جاتی ہے:

| نمبر | آڈٹ کی رائے  | وضاحت  |
|------|--|--|
| 1    | ہمیں بیننس شیٹ کی تاریخ کے بعد تقرری دی گئی تھی اس کے نتیجے میں، ہم سرمایہ کاری کی جائیدادوں اور گلسڈ ہاؤس کی مقدار اور حالت کے بارے میں مناسب یقین دہانی حاصل کرنے کے لئے ضروری آڈٹ طریقہ کار کو انجام دینے سے قاصر رہے۔ جو 31 دسمبر 2023 کو غیر مجموعہ مالی حالت کے بیان میں ظاہر ہیں، اور مناسب کنٹ آف طریقہ کار کے اطلاق کی تصدیق بھی نہیں کر سکتے۔ ہم بیننس شیٹ کی تاریخ کے بعد کے واقعات کا جائزہ بھی نہیں لے سکے جو ہمارے آڈٹ رپورٹ کی تاریخ تک مالی بیانات پر اثر انداز ہو سکتے ہیں۔ مزید برآں، اس سلسلے میں کسی قابل آڈٹ طریقہ کار کی عدم موجودگی کے باعث، ہم ان طریقہ کار کے مقاصد کے بارے میں مناسب اور کافی آڈٹ شواہد حاصل کرنے میں کامیاب نہیں ہو سکے۔ نتیجے کے طور پر، ہم اس بات کا اندازہ نہیں لگا سکتے کہ ان آڈٹ طریقہ کار کے نتیجے میں کی جانے والی کسی بھی ایڈجسٹمنٹ کا اثر، اگر کوئی ہو، غیر مجموعہ مالی بیانات میں ظاہر شدہ بیننس پر کیا پڑے گا۔ | یہ اس وجہ سے ہے کہ 31 دسمبر 2023 کو ختم ہونے والے سال کے لیے خارجی آڈیٹرز کی تقرری 2024 میں کی گئی تھی، جو ایک فطری عہد ورسٹ ہے۔ |

### سالانہ عام اجلاس کے انعقاد کی ہدایت / تیاری:

کمپنیز ایکٹ 2017 کے سیکشن (1) 147 کے تحت کمپنی کی درخواست کے جواب میں، لیٹر نمبر - CS.SEC/19th, 20th AGM/Sec.147 مورخہ 9 اگست 2024 CA/2024 کے مطابق، سیکیورٹیز اینڈ ایکسچینج کمیشن آف پاکستان (SECP) نے اپنے لیٹر نمبر E-0004795 مورخہ 12 اگست 2024 کے ذریعے مطلع کیا کہ سرکلر نمبر 07/2024 مورخہ 7 مارچ 2024 کے مطابق، کمپنیز ایکٹ 2017 کے سیکشن 147 کا مقصد کمپنی کے ممبران یا ڈائریکٹرز کو کمیشن کی مداخلت سے کمپنی کو التوا میں جزل میٹنگز منعقد کرنے پر مجبور کرنے کا اختیار دینا ہے۔ نتیجتاً، سیکشن 147 کے تحت کسی بھی درخواست کو کمیشن کے ذریعے غور نہیں کیا جائے گا اگر وہ خود کمپنی کی طرف سے یا اس کی طرف سے دائر کی گئی ہے، کیونکہ کمپنی اپنے خلاف ہدایت نہیں لے سکتی۔

مزید برآں، SECP نے واضح کیا کہ اگر کمپنی کمپنیز ایکٹ 2017 کے سیکشن 147 کو لاگو کیے بغیر اپنی التوا میٹنگز کرتی ہے، تو ان میٹنگز کو درست تصور کیا جائے گا، بشرطیکہ وہ متعلقہ قانونی دفعات کے مطابق منعقد ہوں۔

لہذا، SECP کی ہدایت کے مطابق، کمپنی سال 2023 کے لیے اپنی سالانہ جزل میٹنگ 13 مئی 2025 کو منعقد کرے گی۔

**ڈیویڈنڈ کے لیے سفارش:**

بورڈ آف ڈائریکٹرز نے مالی سال 2023 کے لیے 700 ملین روپے کے حتمی ڈیویڈنڈ سفارش کی ہے اور اسے بورڈ آف ڈائریکٹرز نے اعلان کے لیے منظور کر لیا ہے۔

**کارپوریٹ اور مالیاتی رپورٹنگ فریم ورک کا بیان:**

کارپوریٹ قوانین، قواعد، اور ضوابط کمپنی کے بورڈ آف ڈائریکٹرز کے امور کا خاکہ پیش کرتے ہیں۔ بورڈ اپنی کارپوریٹ ذمہ داریوں کو تسلیم کرتا ہے جیسا کہ کمپنیز ایکٹ 2017، اور کوڈ آف کارپوریٹ گورننس برائے بیمہ کنندگان 2016 اور پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) قواعد 2013 کے تحت بیان کیا گیا ہے، اور درج ذیل بیانات فراہم کرتا ہے:

- کمپنی کی طرف سے تیار کردہ مالیاتی بیانات اس کی حالت، آپریشن کے نتائج، نقد بہاؤ، اور ایکویٹی میں تبدیلیوں کو اچھی طرح سے پیش کرتے ہیں۔ کمپنی نے کمپنیز ایکٹ 2017 کے مطابق اکاؤنٹ کی مناسب کتابیں مرتب کی ہیں۔

- کمپنی نے مالی بیانات کی تیاری میں مناسب اکاؤنٹنگ پالیسیوں کی مسلسل پیروی کی ہے۔ کی گئی کسی بھی تبدیلی کا انکشاف کر دیا گیا ہے، اور اکاؤنٹنگ کے تخمینے دانشمندانہ اور معقول فیصلے پر مبنی ہیں۔

- مالیاتی گوشوارے پاکستان میں لاگو ہونے والے بین الاقوامی مالیاتی رپورٹنگ معیارات (IFRS) کے مطابق تیار کیے گئے ہیں۔ ان معیارات سے کوئی بھی انحراف، اگر کوئی ہے، مناسب طور پر ظاہر اور وضاحت کی جاتی ہے۔

- کمپنی کے بنیادی اصول مضبوط ہیں، اور اس کی ایک جاری تشویش کے طور پر جاری رکھنے کی صلاحیت کے بارے میں کوئی شک نہیں ہے۔

**پبلک سیکٹر کمپنیوں (کارپوریٹ گورننس) کے قواعد، 2013 اور بیمہ کنندگان کے لیے ضابطہ کارپوریٹ گورننس، 2016 کے ساتھ تعمیل:**

اگرچہ 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی گوشواروں کے ساتھ اس رپورٹ پر دستخط اور منظوری دینے والے ڈائریکٹرز اس مدت کے دوران موجود نہیں تھے جس سے یہ مالیاتی بیانات متعلق ہیں، موجودہ ڈائریکٹرز نے اس رپورٹ اور 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی گوشواروں کا جائزہ لیا اور اس کی منظوری دی ہے۔ یہ منظوری اسی مدت کے لیے مالیاتی گوشواروں / اکاؤنٹس پر دستخط اور منظوری کے لیے بورڈ کو فراہم کردہ معاوضے پر مبنی ہے، جیسا کہ اس رپورٹ کے "ڈس کلیمر اور معاوضہ" سیکشن میں تفصیل سے بتایا گیا ہے۔ موجودہ ڈائریکٹرز نے تعمیل اور عدم تعمیل کے متعلقہ بیانات کی بھی توثیق کی ہے تاکہ اس بات کو یقینی بنایا جاسکے کہ فائلنگ کے تمام تقاضوں کو قانون کے ذریعہ لازمی طور پر پورا کیا گیا ہے۔

بورڈ کو مذکورہ بالا معاوضے کی بنیاد پر، پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) رولز 2013 کے رول 24 کے تحت تعمیل اور عدم تعمیل کے بیانات، اور کوڈ آف کارپوریٹ گورننس برائے بیمہ کنندگان 2016 کی شق (lxxvi): ضابطہ کارپوریٹ گورننس برائے بیمہ کنندگان 2016 کی شقیں (lxxviii) سے (lxxx) کو S.R.O.277(1)/2020 مورخہ 1 اپریل 2020 کے ذریعہ چھوڑ دیا گیا تھا [اسی کے مطابق تیار کیا گیا ہے۔ لہذا، چونکہ موجودہ تاریخ کے مطابق یہ دفعات مزید موجود نہیں ہیں، اس لیے انشورنس آرڈیننس 2000 کے سیکشن 11 اور سیکشن 12 کے ساتھ تعمیل کا بیان پیش نہیں کیا گیا ہے۔ موجودہ بورڈ آف ڈائریکٹرز نے اس رپورٹ کی منظوری، دستخط، جاری، اور مالیاتی بیانات سے منسلک کیا ہے، بغیر کسی مالیاتی قانونی ذمہ داری یا کسی بھی قسم کا خطرہ مول لیا ہے۔ اس کی وجہ یہ ہے کہ موجودہ بورڈ اس مدت کے دوران موجود نہیں تھا جس سے ان اکاؤنٹس کا تعلق ہے اور کمپنیز آرڈیننس 1984 (حالیہ کمپنیز ایکٹ 2017)، انشورنس آرڈیننس 2000، پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) رولز 2013، اور کوڈ آف کارپوریٹ گورننس برائے بیمہ کنندگان 2016، کی ضروریات کے حوالے سے درست تعمیل کی حیثیت کی تصدیق کرنے سے قاصر ہے۔

#### انشورنس آرڈیننس 2000 کے سیکشن (6) 46 کے تحت تعمیل کا بیان:

پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) رولز 2013 کے رول 24 کے تحت تعمیل اور عدم تعمیل کے بیان کی طرح، انشورنس آرڈیننس 2000 کے سیکشن (6) 46 کے تحت ضروری تعمیل کا بیان درج ذیل ہے:

”انشورنس آرڈیننس 2000 کے سیکشن 46 کے ذیلی سیکشن (6) کی تعمیل میں، ہم، M/S NATIONAL INSURANCE COMPANY LIMITED کے بورڈ آف ڈائریکٹرز، ہولڈنگ انشورنس رجسٹریشن نمبر 183 مورخہ یکم جنوری 2002 کے ذریعے 31 دسمبر 2023 کو اختتام پذیر ہونے والے سال کے مالیاتی گوشواروں پر دستخط کرنے کے لیے بورڈ کے چیئرمین، چیف ایگزیکٹو آفیسر، اور بورڈ کی طرف سے نامزد کردہ ووڈائریکٹرز مندرجہ ذیل بیان جاری کرتے ہیں:

- (a) ہماری رائے میں، کمپنی کے سالانہ قانونی اکاؤنٹس، جیسا کہ اس بیان کے ساتھ منسلک فارموں میں بیان کیا گیا ہے، انشورنس آرڈیننس 2000 اور اس کے تحت بنائے گئے کسی بھی قواعد کے مطابق تیار کیا گیا ہے۔
- (b) بیمہ کنندہ نے، سال 2023 کے دوران، بیمہ آرڈیننس 2000 کی درج ذیل دفعات اور اس کے تحت بنائے گئے قواعد کی تعمیل کی ہے، جن سے متعلق:

- i. کم از کم ادا شدہ شیئر کمپنیل کی ضروریات سے متعلق آرڈیننس کی دفعات؛
- ii. کم از کم سالوینسی کی ضروریات سے متعلق آرڈیننس کی دفعات؛
- iii. ری انشورنس کے انتظامات کے حصول سے متعلق آرڈیننس کی دفعات۔

(c) اس بیان کی تاریخ تک، بیمہ کنندہ انشورنس آرڈیننس 2000 کی درج ذیل دفعات اور اس کے تحت بنائے گئے قواعد کی تعمیل کرتا رہتا ہے، جن سے متعلق:

- i. کم از کم ادا شدہ شیئر کمیٹیٹل کی ضروریات سے متعلق آرڈیننس کی دفعات؛
- ii. کم از کم سالوینسی کی ضروریات سے متعلق آرڈیننس کی دفعات؛
- iii. ری انشورنس کے انتظامات کے حصول سے متعلق آرڈیننس کی دفعات۔

انشورنس آرڈیننس 2000 کے سیکشن (6) 46 کے تحت تعمیل کا مذکورہ بالا بیان، تنہائی میں نہیں پڑھا جانا چاہیے؛ بلکہ، اس پر اس رپورٹ میں فراہم کردہ ”ڈس کلیمر اور معاوضہ“ سیکشن کے ساتھ ملا کر غور کیا جانا چاہیے۔

جامع بیانات تیار کرنے اور فائل کرنے کی ضرورت سے استثنیٰ:

NICL کے ذیلی ادارے، سوک سینٹر کمپنی لمیٹڈ (CCCL) کے سال 2023 کے مالیاتی گوشواروں کا آڈٹ اور منظوری نہیں دی گئی ہے۔ نتیجتاً، سال 2023 کے لیے NICL کے مالیاتی گوشوارے تیار نہیں کیے جاسکتے۔

CCCL کے اکاؤنٹس کو حتمی شکل دینے میں تاخیر کی وجہ NICL کے بورڈ آف ڈائریکٹرز کی عدم موجودگی ہے، کیونکہ CCCL کے ڈائریکٹرز بھی NICL کے ڈائریکٹر ہیں۔

لہذا، کمپنی کی جانب سے کمپنیز ایکٹ 2017 کے سیکشن (7) 228 کے تحت اور کمپنیز (جنرل پروسیجرز اینڈ فارمز) ریگولیشنز 2018 کے ریگولیشن 5 کے مطابق درخواست دائر کی گئی، جس میں لیٹر نمبر CS.SEC/Accounts/indemnity/2024/2 مورخہ 12 نومبر 2024 جاری کیا گیا، جس کے ذریعے پاکستان سیکورٹیز اینڈ ایکسچینج کمیشن سے 2021، 2022، 2023 اور 2024 کے لئے مشترکہ مالیاتی بیانات کی تیاری، آڈٹ اور جمع کرانے کے حوالے سے سیکشن 228 کے تقاضوں سے استثنیٰ دینے کی ہدایات کی درخواست کی گئی۔ پاکستان سیکورٹیز اینڈ ایکسچینج کمیشن نے اپنے لیٹر نمبر ID/PRDD/020-RA/2024/3367 مورخہ 11 دسمبر 2024 کے ذریعے سیکشن 228 کے تقاضوں سے 2021، 2022، 2023 اور 2024 کے لئے مطلوبہ استثنیٰ فراہم کر دیا۔

دستبرداری اور معاوضہ:

جیسا کہ پہلے ذکر کیا گیا ہے، کمپنی کے موجودہ بورڈ آف ڈائریکٹرز 8 اگست 2023 کو مطلع کیا گیا تھی اور ان کا پہلا اجلاس 13 نومبر 2023 کو منعقد ہوا تھا۔ اس وقت 2017 کے بعد کسی بھی سال کیلئے NICL کے اکاؤنٹس کا آڈٹ نہیں کیا گیا تھا۔ گزشتہ بورڈ نے 10 اگست 2020 کو ایس ای سی پی کی طرف سے فراہم کردہ معاوضے کی بنیاد پر سال 2015، 2016 اور 2017 کے مالیاتی گوشواروں کی منظوری اور دستخط کیے تھے۔

اسی بنیاد پر، کمپنی کے لیٹر نمبر CS.SEC/Accounts/indemnity/2024 مورخہ 11 جولائی 2024 کے ذریعے پاکستان سیکورٹیز اینڈ ایکسچینج کمیشن (SECP) کے انشورنس ڈویژن سے NICL کے بورڈ کو 2018 سے 2023 تک کے لئے مالیاتی بیانات پر دستخط کرنے اور ان کی منظوری دینے کے لیے انڈیمینٹی جاری کرنے کی درخواست کی گئی تھی، جس کا جواب SECP نے اپنے لیٹر نمبر ID/PRDD/020-RA/2024/3290 مورخہ 19 جولائی 2024 میں دیا۔ SECP کے اس خط کی روشنی میں، کمپنی کے بورڈ آف ڈائریکٹرز نے 2023 کے مالیاتی بیانات کو منظور کرنے، دستخط کرنے اور ان کی سفارش کرنے کا فیصلہ کیا تاکہ انہیں SECP کی اجازت کے تحت کمپنیز ایکٹ 2017 کے سیکشن 147 کے تحت 24 ویں سالانہ جنرل میٹنگ میں شیئر ہولڈرز کے سامنے پیش کیا جاسکے۔

موجودہ بورڈ آف ڈائریکٹرز نے SECP کے لیٹر نمبر ID/PRDD/020-RA/2024/3290 مورخہ 19 جولائی 2024 کے ذریعے جاری کی جانے والی انڈیمینٹی کی بنیاد پر ان مالیاتی بیانات کی منظوری اور دستخط کرنے کی ابتداء کی ہے، کیونکہ موجودہ بورڈ اس مدت کے دوران موجود نہیں تھا جس سے یہ مالیاتی بیانات متعلق ہیں، نہ ہی بورڈ اس مدت کے دوران کمپنی کی حالات اور کمپنیز آرڈیننس 1984 (حالیہ کمپنیز ایکٹ 2017)، انشورنس آرڈیننس 2000، پبلک سیکٹر کمپنیز (کارپوریٹ گورننس) رولز 2013، اور انشوررز کے لیے کارپوریٹ گورننس کے ضابطے 2016 کے مطابق کمپنی کی تعمیل کی صورت حال سے آگاہ ہے۔ اسی طرح، موجودہ ڈائریکٹرز نے 31 دسمبر 2023 کو ختم ہونے والے مالی سال کے لیے اس رپورٹ کو مالیاتی بیانات کے ساتھ منظور کیا اور دستخط کیے، اور متعلقہ تعمیل/عدم تعمیل کے بیانات بھی دستخط کیے تاکہ قانون کے تحت فائلنگ کی ضروریات کو پورا کیا جاسکے۔

بورڈ کو مذکورہ بالا معاوضے کی بنیاد پر:

- i. تعمیل/عدم تعمیل کے بیانات کو موجودہ بورڈ آف ڈائریکٹرز کے ذریعہ ان مالیاتی بیانات کی منظوری، دستخط، جاری، اور ان کے ساتھ منسلک کیا گیا ہے، بغیر کسی مالی یا قانونی ذمہ داری یا کسی بھی قسم یا کسی بھی قسم کے خطرے کے؛ اور
- ii. مالیاتی گوشواروں اور/یا اس کے ساتھ منسلک تمام بیانات اور نوٹس کی منظوری اس مدت کے دوران کی گئی لین دین کی منظوری یا تفصیل نہیں دیتی جس سے یہ کھاتوں کا تعلق ہے یا اس سے قبل کی مدت۔

**سیکرٹریل پریکٹسز کی تعمیل:**

ایک سیکریٹرل کمپلائنس سرٹیفکیٹ، جیسا کہ کوڈ آف کارپوریٹ گورننس برائے بیمہ کنندگان 2016 کی شق (xxxiii) کے تحت درکار ہے، اور کمپنی سیکریٹری کے دستخط شدہ، 31 دسمبر 2023 کو ختم ہونے والے سال کے سالانہ مالیاتی بیانات کے حصے کے طور پر اس کے ساتھ فراہم کیا جاتا ہے۔

**صحت، حفاظت، اور ماحولیات:**

ہم اپنے ملازمین اور ان کیونٹریز کی فلاح و بہبود کو یقینی بنانے کے لیے جہاں ہم کام کرتے ہیں صحت، حفاظت اور ماحولیاتی طریقوں میں اعلیٰ ترین معیارات کو برقرار رکھنے کے لیے پرعزم ہیں۔ ریکل اسٹیٹ ڈیپارٹمنٹ ہماری جائیدادوں کا انتظام کرتا ہے اور صحت، حفاظت (بشمول حفظان صحت) اور عمارتوں اور ان کے کمینوں بشمول کرایہ داروں کی حفاظت سے متعلق معاملات کو سنبھالتا ہے۔ تاہم، کمپنی کے کاروبار کی نوعیت کو دیکھتے ہوئے، یہ مجموعی صحت، حفاظت، یا ماحول کے لیے کوئی خاص خطرہ نہیں لاتا ہے۔

#### ملازمین کے ریٹائرمنٹ کے فوائد:

31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی بیانات کے نوٹ 21 میں ملازمین کے ریٹائرمنٹ فوائد سے متعلق موخر واجبات اور نقل و حرکت کے بارے میں تفصیلی معلومات فراہم کی گئی ہیں۔

#### انٹرنل آڈٹ:

انٹرنل آڈٹ ڈپارٹمنٹ کا قیام 2020 میں ایک قابل چارٹرڈ اکاؤنٹنٹ کی بطور چیف انٹرنل آڈیٹر تقرری کے ساتھ کیا گیا تھا، جو براہ راست بورڈ آڈٹ کمیٹی کو رپورٹ کرتا ہے۔ اس کے بعد، بورڈ آف ڈائریکٹرز نے ایک انٹرنل آڈٹ مینول تیار کیا اور اس کی منظوری دی۔ یہ دستور العمل خطرے پر مبنی اندرونی آڈٹ پلان کا خاکہ پیش کرتا ہے، جسے اسی کے مطابق نافذ کیا گیا ہے۔ جس کے نتیجے میں اندرونی آڈٹ رپورٹس بورڈ آڈٹ کمیٹی کو پیش کر دی گئی ہیں۔ سال 2020 سے قبل انٹرنل آڈٹ ڈپارٹمنٹ مکمل طور پر فعال نہیں تھا۔ اس مدت کے دوران، محکمہ نے کسی بھی ادائیگی سے پہلے تمام واؤچرز اور لین دین کا پری آڈٹ کیا۔

#### مالی بیانات:

کمپنی کی انتظامیہ کی طرف سے تیار کردہ مالیاتی بیانات، اس کی مالی پوزیشن، آپریشنز کے نتائج، نقد بہاؤ، اور ایکویٹی میں تبدیلیوں کی درست عکاسی کرتے ہیں، جس کی تصدیق بیرونی آڈیٹر نے اپنی رپورٹ میں کی ہے۔

#### کھاتوں کی کتابیں:

کمپنی نے کھاتوں کی مناسب کتابیں رکھی ہیں، جیسا کہ بیرونی آڈیٹر نے اپنی رپورٹ میں تصدیق کی ہے۔

#### اکاؤنٹنگ پالیسیاں:

مالیاتی گوشواروں کی تیاری میں اکاؤنٹنگ کی مستقل پالیسیوں کا اطلاق کیا گیا ہے، اور اکاؤنٹنگ کے تخمینے معقول اور دانشمندانہ فیصلے پر مبنی ہیں، جیسا کہ بیرونی آڈیٹر نے اپنی رپورٹ میں نوٹ کیا ہے۔

#### بین الاقوامی اکاؤنٹنگ معیارات:

مالیاتی گوشواروں کی تیاری میں پاکستان میں لاگو بین الاقوامی اکاؤنٹنگ معیارات کی پیروی کی گئی ہے، جس کی تصدیق بیرونی آڈیٹر نے اپنی رپورٹ میں کی ہے۔

#### انٹرنل کنٹرول سسٹم:

کمپنی کا انٹرنل کنٹرول سسٹم مسلسل ترقی سے گزر رہا ہے۔ موجودہ بورڈ پیشہ ورانہ کنسلٹنٹس کے ساتھ مستعدی سے کام کر رہا ہے تاکہ بہترین طریقوں سے ہم آہنگ پالیسیوں کو ڈیزائن اور لاگو کیا جاسکے۔ مزید برآں، بورڈ اندرونی کنٹرول کے فریم ورک کو مزید بڑھانے کے لیے ایک اہل چیف انٹرنل آڈیٹر کی تقرری کے عمل میں ہے۔ پوری کمپنی میں اندرونی کنٹرول کو مضبوط بنانے کے لیے کئی دیگر اقدامات کیے جا رہے ہیں۔

### جاری تشویش:

کمپنی ایک جاری تشویش کے طور پر جاری رکھنے کی اپنی صلاحیت پر اعتماد ہے۔ لہذا، 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی گوشوارے اسی بنیاد پر تیار کیے گئے ہیں۔

### ٹیکسز اور لیویز:

ٹیکسز اور لیویز کے بارے میں معلومات 31 دسمبر 2023 کو ختم ہونے والے مالی سال کے مالیاتی بیانات کے نوٹ 32 میں دی گئی ہیں۔

### قانونی ادائیگیاں:

31 دسمبر 2023 تک، ٹیکسز، ڈیوٹی، لیویز، اور چار جز سے متعلق کوئی بقایا قانونی ادائیگیاں نہیں ہیں، سوائے ان مالیاتی گوشواروں کے جن کا انکشاف کیا گیا ہے۔

### متعلقہ فریقین کے ساتھ لین دین:

متعلقہ فریقین کے ساتھ لین دین کے بارے میں تفصیلی معلومات 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی بیانات کے نوٹ 35 میں شامل ہیں۔

### مواصلات:

شیر ہولڈرز کے ساتھ موثر مواصلت کمپنی کے لیے ایک ترجیح ہے۔ مالیاتی گوشواروں اور سالانہ رپورٹس کو ممبران میں تقسیم کیا جاتا ہے اور بورڈ کی منظوری کے بعد کمپنی کی ویب سائٹ ([www.nicl.com.pk](http://www.nicl.com.pk)) پر دستیاب کرایا جاتا ہے۔ ایک بار زیر التواء کھاتوں کو بورڈ کی طرف سے منظور کر لیا جاتا ہے اور حصص یافتگان کی طرف سے ان کے متعلقہ سالانہ عام اجلاسوں میں اپنا لیا جاتا ہے، کمپنی اس بات کو یقینی بنائے گی کہ تمام ششماہی اور سہ ماہی رپورٹس بھی کمپنی کی ویب سائٹ پر کمپنیز ایکٹ 2017 کے ذریعے متعین کردہ مائٹ لائنز کے اندر گردش اور پوسٹ کی جائیں۔ کمپنی کی ویب سائٹ [www.nicl.com.pk](http://www.nicl.com.pk) اس کی سرگرمیوں اور مالیاتی رپورٹس کے بارے میں تفصیلی معلومات فراہم کرتی ہے۔

### غیر ایڈجسٹ کرنے والے واقعات اور وعدے:

بیرونی آڈیٹرز کے مطابق، 31 دسمبر 2023 کو ختم ہونے والے سال کے لیے مالیاتی گوشواروں میں کوئی غیر ایڈجسٹ کرنے والے مادی واقعات نہیں تھے جن کے لیے انکشاف کی ضرورت ہو۔ مزید برآں، ہنگامی حالات اور وعدوں کی تفصیلی وضاحت 31 دسمبر 2023 کو ختم ہونے والے سال کے مالی بیانات کے نوٹ 22 میں دی گئی ہے۔

### ریکارڈ کی حفاظت:

کمپنی اپنے مالیاتی ریکارڈ کے محفوظ ذخیرہ اور تحویل کو ترجیح دیتی ہے۔ اوریکل پر مبنی GIS سسٹم مالیاتی معلومات کو ریکارڈ کرنے کے لیے استعمال کیا جاتا ہے، اور الیکٹرانک دستاویزات تک رسائی کو ایک جامع، پاس ورڈ سے محفوظ اجازت میسر کس کے ذریعے کنٹرول کیا جاتا ہے۔ مزید برآں، ریکارڈز اور فائلوں کو ڈیجیٹل کیا گیا ہے تاکہ ان کی طبعی اور ڈیجیٹل دونوں شکلوں میں دستیابی کو یقینی بنایا جاسکے۔

### وسل بلور پالیسی:

کمپنی کے پاس وسیل بلور پالیسی موجود ہے۔

### ضابطہ اخلاق:

کمپنی نے ایک ”ضابطہ اخلاق“ قائم کیا ہے جسے بورڈ آف ڈائریکٹرز نے منظور کیا ہے۔ یہ ضابطہ انسانی حقوق اور ملازمین کے مفادات کا احترام کرتے ہوئے ایمانداری، دیانتداری اور شفافیت کے ساتھ کاروباری کارروائیوں کی رہنمائی کے لیے ڈیزائن کیا گیا ہے۔ ضابطہ تمام اسٹیک ہولڈرز بشمول سرکاری اداروں، ملازمین، کلائنٹس، شیئرز ہولڈرز اور دیگر کے احترام پر زور دیتا ہے۔ یہ کمپنی کی ویب سائٹ پر دستیاب ہے۔

### بنیادی خطرات اور غیر یقینی صورتحال:

کمپنی کو درپیش بنیادی خطرات اور غیر یقینی صورتحال کے بارے میں معلومات 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی بیانات کے نوٹ 38 میں دی گئی ہیں۔

### آڈیٹرز:

31 دسمبر 2023 کو ختم ہونے والے سال کے آڈیٹرز، میسرز RSM اویس حیدر لیاقت نعمان، چارٹرڈ اکاؤنٹنٹس نے انسٹی ٹیوٹ آف چارٹرڈ اکاؤنٹنٹس آف پاکستان (ICAP) کے کوالٹی کنٹرول ریویو پروگرام کے تحت تسلی بخش ریٹنگ حاصل کی ہے۔ انہوں نے بین الاقوامی فیڈریشن آف اکاؤنٹنٹس (IFAC) کے ضابطہ اخلاق سے متعلق رہنما خطوط پر عمل کرنے کی تصدیق کی ہے، جیسا کہ ICAP نے اپنایا ہے۔ بیرونی آڈیٹرز کا تقرر مکمل طور پر آڈیٹنگ خدمات کے لیے کیا گیا ہے اور وہ کمپنیز ایکٹ 2017 اور انشورنس آرڈیننس 2000 کی دفعات کے مطابق کسی بھی دوسری خدمات میں مصروف نہیں ہیں جو ان کی آزادی سے سمجھوتہ کرے۔ انہوں نے اس سلسلے میں IFAC کے رہنما خطوط کی تعمیل کی تصدیق کی ہے۔

بیرونی آڈیٹرز نے آڈٹ کمیٹی کے اجلاسوں میں شرکت کی جہاں کمپنی کے آڈٹ شدہ یا نظر ثانی شدہ مالیاتی گوشواروں پر تبادلہ خیال کیا گیا۔ یہ نوٹ کرنا ضروری ہے کہ 31 دسمبر 2023 کو ختم ہونے والے سال کے مالیاتی گوشواروں کا نہ تو بیرونی آڈیٹرز نے آڈٹ کیا اور نہ ہی متعلقہ سال 2023 کے دوران بورڈ آف ڈائریکٹرز کی طرف سے منظوری دی گئی۔ آڈیٹرز نے اپنی آزادی کی تصدیق کی ہے اور بورڈ کو لکھے گئے خط میں اپنے تمام خدشات کی اطلاع دی ہے۔ آڈٹ کمیٹی اور بورڈ نے سال 2024 میں مالی سال 2020، 2021، 2022 اور 2023 کے لیے بیرونی آڈیٹرز کی تقرری اور ان کی معقول فیس کی سفارش بورڈ کے غور و خوض کے لیے کی۔ مذکورہ سالوں کے لیے آڈیٹرز کی تقرری 12 ستمبر 2024 کو منعقدہ 20 ویں سالانہ جنرل میٹنگ میں کی گئی۔

اظہار تشکر:

موجودہ بورڈ آف ڈائریکٹرز کمپنی کے اندرونی کنٹرول سسٹم کو مضبوط بنانے اور مجموعی کام کے معیار کو بہتر بنانے کے لیے بھرپور کوششیں کر رہا ہے۔ اس مقصد کے لیے جدید ٹیکنالوجی، سسٹمز کی ڈیجیٹائزیشن، ملازمین کی مہارت اور صلاحیتوں کی ترقی، اور مزید مسابقتی حکمت عملی کی جانب پیش رفت کی جا رہی ہے۔


کمپنی کے بورڈ آف ڈائریکٹرز انتظامیہ اور ریگولیٹرز کے تعاون اور حمایت کے شکر گزار ہیں، کیونکہ ان کے بغیر کمپنی ان مالیاتی گوشواروں کی تکمیل اور دیگر اقدامات حاصل نہیں کر سکتی تھی جو بورڈ آف ڈائریکٹرز نے کیے ہیں۔

ہم اپنے حصص یافتگان کے ہم پر کیے گئے اعتماد کی بھی تعریف کرتے ہیں اور اپنے صارفین، ملازمین، اسٹریٹجک شراکت داروں، وینڈرز اور سپلائرز کا تہہ دل سے شکریہ ادا کرتے ہیں۔

مزید برآں، ہم سال بھر سیکیورٹیز اینڈ ایکسچینج کمیشن آف پاکستان کی طرف سے فراہم کردہ مسلسل تعاون اور رہنمائی کا اعتراف کرتے ہیں۔



چیف ایگزیکٹو آفیسر

بورڈ کی جانب سے،  
  
 ڈائریکٹر  
 کراچی؛

**NATIONAL INSURANCE COMPANY LIMITED  
STATEMENT OF COMPLIANCES  
FOR THE YEAR ENDED  
DECEMBER 31, 2023**

**ASSURANCE DEPARTMENT**

## Review Report to the Members on the Statement of Compliance with the Public Sector Companies (Corporate Governance) Rules, 2013 and the Code of Corporate Governance for Insurers, 2016

We have reviewed the enclosed Statement of Compliance with the best practices contained in the Public Sector Companies (Corporate Governance) Rules, 2013 and Code of Corporate Governance for Insurers, 2016 (referred to as 'the Codes') prepared by the Board of Directors of National Insurance Company Limited (the Company) for the year ended December 31, 2023 to comply with requirements of the Codes.

The responsibility for compliance with the Codes is that of the Board of Directors of the Company. Our responsibility is to review, to the extent where such compliance can be objectively verified, whether the Statement of Compliance reflects the status of the Company's compliance with the provisions of the Codes and report if it does not and to highlight any non-compliance with the requirements of the Codes. A review is limited primarily to inquiries of the Company's personnel and review of various documents prepared by the Company to comply with the Codes.

As a part of our audit of the financial statements we are required to obtain an understanding of the accounting and internal control systems sufficient to plan the audit and develop an effective audit approach. We are not required to consider whether the Board of Directors' statement on internal control covers all risks and controls or to form an opinion on the effectiveness of such internal controls, the Company's corporate governance procedures and risks.

The Codes require the Company to place before the Audit Committee, and upon recommendation of the Audit Committee, place before the Board of Directors for their review and approval its related party transactions distinguishing between transactions carried out on terms equivalent to those that prevail in arm's length transactions and transactions which are not executed at arm's length price and recording proper justification for using such alternate pricing mechanism. We are only required and have ensured compliance of this requirement to the extent of the approval of the related party transactions by the Board of Directors upon recommendation of the Audit Committee. We have not carried out any procedures to determine whether the related party transactions were undertaken at arm's length price or not.

Based on our review nothing has come to our attention which causes us to believe that the Statement of Compliance does not appropriately reflect the Company's compliance, in all material respects, with the Regulations as applicable to the Company for the year ended December 31, 2023

Further, we highlight below instance(s) of non-compliance with the requirement(s) of the Regulations as reflected in the note/paragraph reference where it/these is/are stated in the Statement of Compliance

| S.NO. | PUBLIC SECTOR COMPANIES<br>(CORPORATE GOVERNANCE)<br>RULES, 2013 |  | DESCRIPTION  |
|-------|--|--|--|
|       | REF. OF<br>RULE<br>NO.   | REF. OF THE ST. OF<br>COMPLIANCE   |  |
| 1.    | 2(d), 3(2),<br>3(5), 3(7),<br>4(1) &<br>4(4)                     | Refer compliance<br>statement point<br>1,2,3,4,5 & 6                         | The Board of Directors finished their 3-year term on 30-05-2021 and after this date NICL remained functional without the Board of Director till reconstitution of New Board on 08-08-2023. The office of chairman remained vacant after 30-05-2021 and new chairman was appointed on 13-11-2023 after reconstitution of the Board of Director of NICL.   |
| 2.    | 5(5)   | Refer compliance<br>statement point # 9<br>and non-compliance<br>section (1) | The Board didn't establish a system of sound internal control, which shall be effectively implemented at all levels within the Public Sector Company.  |
| 3.    | 5(5)(b)<br>(iv) & 18   | Refer explanation<br>for non-compliance<br>section (2)                       | Register of interests is being maintained (commencing from the year 2023) to the Extent of directors in which directors disclose their interest prior to convening of a Board / Committee meeting. However, no register of interests was being maintained for executives during the year 2023. Executives (other than CEO) are perceived to have no impact on decision making at all financial authorities have already been delegated by the Board. |
| 4.    | 5(6)   | Refer compliance<br>statement point # 14                                     | The Board hasn't developed a vision statement and corporate strategy of the company.   |
| 5.    | 5(7)   | Refer explanation<br>for non-compliance<br>section (4)                       | The Board hasn't developed most of the significant policies for the company.   |

|     |                   |  |   |
|-----|-------------------|--|---|
| 6.  | 5(10)             | Refer explanation for non-compliance section (5) | The provision requiring the Board to define level of materiality is itself subjective in nature. However, it is all established that the committees analyze and review various day to day transactions and practices, and then make recommendations to the Board for its consideration. Moreover, the Board has already delegated various financial powers across different levels.   |
| 7.  | 8                 | Refer explanation for non-compliance section (6) | The performance evaluation of members of the Board including the chairman and the chief executive wasn't undertaken annually by the Government for which the Government shall enter into performance contract with each member of the Board at the time of his appointment.   |
| 8.  | 8(2)              | Refer compliance statement point # 19            | The Board hasn't monitored and assessed the performance of Senior management on Annual/half-yearly /quarterly basis* and held them accountable for accomplishing Objectives, goals and key performance indicators set for this purpose.   |
| 9.  | 9                 | Refer explanation for non-compliance section (7) | During the year 2023, all related party transactions were not placed before the Audit Committee, as there were routine transactions with NICL's related parties. However, it may be noted that the Government Auditors are currently carrying audit of all transactions / expenses / claims / payments.   |
| 10. | 10                | Refer compliance statement point # 21            | Every Public Sector Company shall, within one month of the close of first, second and third quarter of its year of account, prepare a profit and loss account for, and balance-sheet as at the end of, that quarter, whether audited or otherwise, for the Board's approval. Annual report including annual financial statements shall be placed on the Public Sector Company's website. This wasn't complied with during the year. |
| 11. | 10,17,19 (4) & 24 | Refer explanation for non-compliance section (8) | At present, the Board has considered and approved the financial statements for the year ended December 31, 2023 along with all applicable deliverables.   |

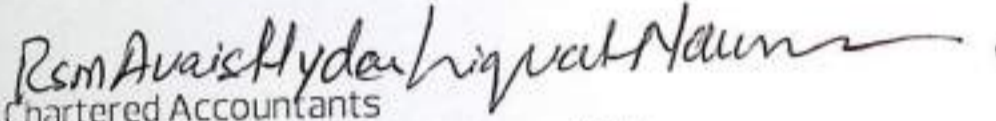
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|-----|-----------|---|--|
| 12. | 13,14 &15 | Refer explanation for non-compliance section (9)  | Mr. Fahad Sultan was given the Acting Charge for the position of CFO on 12-04-2023 was regularized on this position with the approval of the Board of Directors on 22-04-2024.<br><br>The position for CIA remained vacant during the year 2023 and Additional charge for the position of Company Secretary was allowed to Mr. Bilal Kully |
| 13. | 20        | Refer explanation for non-compliance section (10) | NICL did have a Chief Financial Officer as at the year ended December 31, 2023. However, financial statements were endorsed by the current Chief Executive and current CFO before submission to the current Audit Committee and the Board.   |
| 14. | 21(3)     | Refer compliance statement point # 32             | The chief financial officer, the chief internal auditor, and a representative of the external auditors didn't attend all meetings of the audit committee at which issues relating to accounts and audit are discussed.   |
| 15. | 22        | Refer compliance statement point # 33             | The internal audit reports haven't been provided to external auditors for their review.  |

| S.NO. | CODE OF CORPORATE GOVERNANCE (CCG) FOR INSURERS, 2016 |                                       | CLAUSE DESCRIPTION  |
|-------|---|---------------------------------------|---|
|       | REF. OF SECTION NO.                                   | REF. OF THE CCG FOR INSURERS, 2016    |   |
| 1.    | (iii)   | Refer compliance statement point # 30 | The Board of Directors finished their 3-year term on 30-05-2021, and after this date NICL remained functional without the Board of Director till reconstitution of New Board on 08-08-2023, The new Board of Director were later appointed by the Federal Government vide Notification No. 15(1)/2023-AOs-HR dated 08-08-2023 in exercising its power conferred under Section 1(d)&(e), Section 3, Section 10(2)(a) & (b), Section 12 and 13 of State-Owned Enterprises (Governance & Operations) Act, 2023 |
| 2.    | (xi) (b), (c) and (d)                                 | Refer compliance statement point # 30 | The Board has [not] developed a vision mission statement, overall corporate strategy and significant policies of the insurer.   |

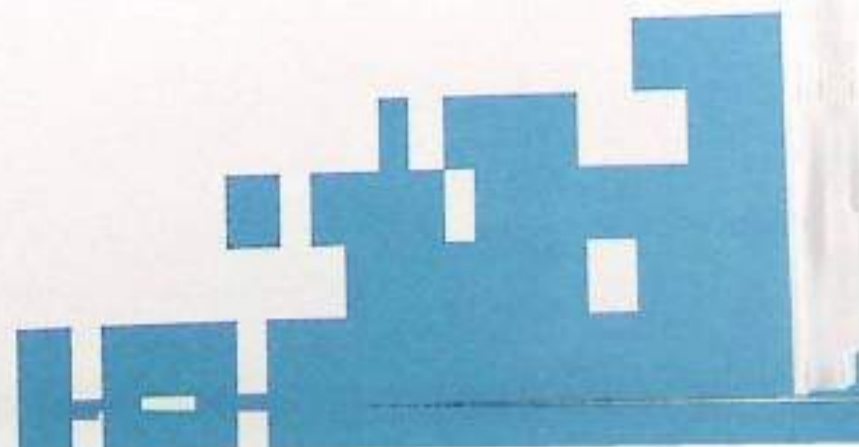
|    |                     |                                       |   |
|----|---------------------|---------------------------------------|---|
| 3. | (xiii)              | Refer compliance statement point # 30 | The Board has [not] established a system of sound internal control. Which is [and to be] effectively implemented at all levels within the insurer. The insurer has [not been able to] adopted and complied with all the necessary aspects of internal controls given in the code.   |
| 4. | (xviii)             | Refer compliance statement point # 30 | Significant issues weren't placed for decision by Board of Directors.   |
| 5. | (xx) (xxi) & (xxii) | Refer compliance statement point # 30 | <p>Chief Financial Officers Company Secretary and Head of Internal Audit (Appointment and approval)</p> <p>Qualification of Chief Financial Officer and Head of Internal Audit</p> <p>The Board did select a qualified person as the CFO of the company (Mr. Qasim Rasheed) in October 2020, who resigned from services in November 2021.</p> <p>In order to enhance effectiveness and efficiency of the Finance Department, the CEO assigned acting charge of CFO post to Mr. Fahad Sultan dated April 12, 2023, prior to that &amp; after the resignation of Mr. Qasim Rashid, CEO Mr. Khalid Hamid was assigned acting charge of CFO post.</p> |
| 6. | (xxv)               | Refer compliance statement point # 30 | The quarterly unaudited financial statements of insurer weren't prepared and circulated along with Directors' Review Report on the affairs of the insurer for the quarter.  |
| 7. | (xxvi)              | Refer compliance statement point # 30 | The insurer didn't ensure that half-yearly financial statements are subjected to a limited scope review by the statutory auditors in such manner and according to such terms and conditions as may be determined by the Institute of Chartered Accountants of Pakistan and approved by the Securities and Exchange Commission of Pakistan.  |

|     |                               |                                       |   |
|-----|-------------------------------|---------------------------------------|---|
| 8.  | (xxvii)                       | Refer compliance statement point # 30 | The insurer didn't ensure that the annual audited financial statements are circulated not later than four months from the close of the financial year unless an extension in terms of sub-section (1) of section 51 of the Insurance Ordinance, 2000 (Ordinance No. XXXIX of 2000) is granted by the Securities and Exchange Commission of Pakistan, in which case the insurer shall circulate the said financial statements on or before the expiry of such extension. |
| 9.  | (xxviii)                      | Refer compliance statement point # 30 | Annual Reviews and compliance procedures  |
| 10. | (xxix) (xxx) & (xxxiii)       | Refer compliance statement point # 30 | Compliance Officer (Adoption of Compliance program, appointment of and assignment of duties to Compliance officer: reporting line of the Compliance officer and duties & responsibilities of Compliance Officer).   |
| 11. | (xxix) (xxx) & (xxxiii)       | Refer compliance statement point # 30 | Responsibilities for Financial reporting and Corporate Compliance   |
| 12. | (xliii)                       | Refer compliance statement point # 30 | Management Committees   |
| 13. | (xliii)                       | Refer compliance statement point # 30 | Board Committees  |
| 14. | (lviii) & (lix)               | Refer compliance statement point # 30 | Internal Audit  |
| 15. | (xxxiii) r/w (lx) to (ixviii) | Refer compliance statement point # 30 | External Auditors   |
| 16. | (lix)                         | Refer compliance statement point # 30 | Risk Management System  |
| 17. | (lxx) & (lxxi)                | Refer compliance statement point # 30 | Risk Management Function Department   |
| 18. | (lxxiii)                      | Refer compliance statement point # 30 | Actuary   |

|     |                    |                                       |   |
|-----|--------------------|---------------------------------------|---|
| 19. | (lxxii)            | Refer compliance statement point # 30 | Rating by a Credit Rating agency  |
| 20. | (lxxiv) & (lxxv)   | Refer compliance statement point # 30 | Grievance Function (Establishment of & Procedure for the Grievance Function of an insurer) & Claims Settlement Committee to oversee   |
| 21. | (lxxvi) & (lxxvii) | Refer compliance statement point # 30 | Compliance with the code of Corporate Governance (Preparation & circulation of the reviewed statement of compliance with best Practices of corporate Governance along with annual report) |

  
 Chartered Accountants  
 Engagement Partner: Syed Naveed Abbas  
 Karachi.

Dated: 08 May 2025  
 UDIN: CR202310239ret34R0wO



## **THE CODE OF CORPORATE GOVERNANCE FOR INSURANCE, 2016**

### **STATEMENT OF COMPLIANCE WITH THE CODE OF CORPORATE GOVERNANCE FOR INSURER, 2016**

Name of Insurer: **NATIONAL INSURANCE COMPANY LIMITED**  
Year Ended: **December 31, 2023**

This statement is being presented in compliance with the code of Corporate Governance for insurers, 2016 for the purpose of establishing a framework of good governance, whereby an insurer is managed in compliance with the best practices of corporate governance.

The insurer has applied the principles contained in the Code in the following manner.

1. The insurer encourages representation of independent non-executive directors and directors representing minority interests on its Board included:

| Category                            | Names                            | Date of Appointment        |
|-------------------------------------|----------------------------------|----------------------------|
| Independent Directors               | 1. Mr. Ali Syed                  | 08-08-2023 till 07-08-2026 |
|                                     | 2. Mr. Abid Sattar               | 08-08-2023 till 07-08-2026 |
|                                     | 3. Mr. Shahid Sattar             | 08-08-2023 till 07-08-2026 |
|                                     | 4. Mr. Sahibzada Rafat Raoof Ali | 08-08-2023 till 07-08-2026 |
|                                     | 5. Mr. Muhammad Jaffer Raza      | 08-08-2023 till 27-01-2025 |
| Executive Directors / Ex-Officio    | 1. Mr. Khalid Hamid(CEO)         | 24-05-2021 till 10-03-2025 |
| Non-Executive Directors/ Ex-Officio | 1. Syed Hamid Ali                | 08-08-2023 till 07-08-2026 |
|                                     | 2. Dr. Aftab Imam                | 08-08-2023 till 07-08-2026 |
|                                     | 3. Dr. Iftikhar Amjad            | 08-08-2023 till 07-08-2026 |

*\* The 3 years term of our previous Board of Directors was completed on 30-05-2021 after that NICL remained without BoD, the new NICL Board was constituted on 08-08-2023.*

All Independent directors meet the criteria of independence as laid down under the Code of Corporate Governance for insurance 2016 of independence as laid down under the Code of Corporate Governance for insurance 2016.

All these directors were appointed nominated by the Government of Pakistan.

1. The directors have confirmed that none of them is serving as a director in more than seven listed companies, including this insurer (excluding the listed subsidiaries of listed holding companies in which each one of them is a director).
2. All the resident directors of the insurer are registered as taxpayers and none of them has defaulted in payment of any loan to a banking company, A DFI or an NBEI or, being a member of stock exchange, has been declared as a defaulter by a stock exchange.
3. No casual vacancy occurred on Board during the year 2023.
4. The insurer has prepared a code of conduct<sup>2</sup>, which has been disseminated among all the directors and employees of the insurer.
5. The Board has [not] developed a vision mission statement, overall corporate strategy and significant policies of the insurer. A complete record of particulars of significant policies along with the dates on which they were approved or amended has been maintained.

6. All power of the Board have been duly exercised and decisions on material transactions, including appointment and determination of remuneration and terms and conditions of employment of the Chief Executive Officer, other Executive Directors and the key officers, have been taken by the Board<sup>3</sup>.
7. The meetings of the Board were presided over the Chairman and in his/ her absence, by a director elected by the Board for this purpose and the Board met at least once in every quarter. Written notice of the Board meetings, along with agenda and working papers, were circulated at least seven (7 days before the meeting) exception the case of emergent meetings, where the notices and agenda were circulated at a shorter notice within the approval of the Chairman Board). The minutes of the meeting were appropriately recorded and circulated. It is important to inform that above compliance was ensured the date of first meeting of the Board i.e. 13-09-2023.
8. The Board has [not] established a system of sound internal control. Which is [and to be] effectively implemented at all levels within the insurer. The insurer has [not been able to] adopt and compile with all the necessary aspects of internal controls given in the code.
9. The Board arranged Orientation Course(s) training programs for its directors during the year 2023 to apprise them of their duties and responsibilities.
10. The Board has approved appointment of Company Secretary including their remuneration and terms and conditions of employment in 2016 who resigned from services on 11-08-2023 later on additional charge was allowed to Mr. Bilal Kully-
11. The Directors Report for this year has been prepared in compliance with the requirements of the Code of Corporate Governance for Insurers 2016 and fully describes the salient matters required to be disclosed.
12. The Financial statements for the year 2023 of the insurer were duly endorsed by the current Chief Executive Officer and CFO before approval of the Board.
13. The directors, Chief Executive Officer and other executives do not hold any interest in the shares of the insurer other than disclosed in the pattern of shareholding.
14. The insurer has [not] complied with all the corporate and financial reporting requirements of the code of corporate governance for insurers, 2016
15. The board has formed the following Management Committees.
16. **Risk Management and Compliance Committee (From June 04, 2020)**

| S. No | Board Members                      | Designated         |
|-------|------------------------------------|--------------------|
| 1     | Head of Administration             | Member             |
| 2     | Head of Legal                      | Member             |
| 3     | Head of Compliance                 | Member             |
| 4     | Head of IT                         | Member             |
| 5     | Chief Information Security Officer | Member             |
| 6     | Chief Risk Officer                 | Member             |
| 7     | Chief Financial Officer            | Member             |
| 8     | Head of Operations                 | Secretary & Member |
| 9     | Head of Reinsurance                | Member             |
| 10    | Head of Human Resources            | Member             |
| 11    | Head of Internal Audit             | Member             |

**Underwriting, Reinsurance and Co-insurance Committee**

| S. No | Board Members            | Designated |
|-------|--------------------------|------------|
| 1     | Mr. Khalid Hamid         | Chairman   |
| 2     | Mr. Muhammad Usman Ghani | Member     |
| 3     | Mr. Muhammad Awais       | Member     |
| 4     | Mr. Asif Ali Pathan      | Secretary  |

**Claim Settlement Committee**

| S. No | Board Members           | Designated |
|-------|-------------------------|------------|
| 1     | Mr. Khalid Hamid        | Chairman   |
| 2     | Mr. Fahad Sultan Shaikh | Member     |
| 3     | Mr. Khuram Irshad       | Member     |
| 4     | Mr. Asif Ali Pathan     | Secretary  |

17. The Board has formed the following Board Committees.

Ethics, Human Resource & Remuneration Committee (From November 13, 2023)

| Name of the Person with Designation /Position | Category  |
|---|-----------|
| Mr. Shahid Sattar                             | Chairman  |
| Syed Hamid Ali                                | Member    |
| Mr. Sahibzada Rafat Raoof Ali                 | Member    |
| Mr. Khalid Hamid (CEO)                        | Member    |
| Mr. Bilal Kully (Company Secretary)           | Secretary |

Procurement Committee (From November 13, 2023)

| Name of the Person with Designation /Position | Category  |
|---|-----------|
| Muhammad Jaffer Raza                          | Chairman  |
| Mr. Shahid Sattar                             | Member    |
| Dr. Iftikhar Amjad                            | Member    |
| Mr. Khalid Hamid                              | Member    |
| Mr. Bilal Kully (Company Secretary)           | Secretary |

Investment Committee (From November 13, 2023)

| Name of the Person with Designation /Position | Category  |
|---|-----------|
| Mr. Abid Sattar                               | Chairman  |
| Dr. Aftab Imam                                | Member    |
| Mr. Khalid Hamid                              | Member    |
| Mr. Bilal Kully (Company Secretary)           | Secretary |

Audit Committee (From November 13, 2023)

| Name of the Person with Designation /Position | Category  |
|---|-----------|
| Sahibzada Rafat Raoof Ali                     | Chairman  |
| Syed Hamid Ali                                | Member    |
| Mr. Shahid Sattar                             | Member    |
| Dr. Aftab Imam                                | Member    |
| Mr. Bilal Kully (Company Secretary)           | Secretary |

18. The meetings of the Committee were [not] held at least once every quarter prior to approval of interim and final results of the insurer and as required by the Code of Corporate Governance for Insurers 2016. The terms of references of the Committee have been formed and advised to the Committees for compliance [until the end of the year 2023]
19. The Board has [not] set up an effective internal audit function / ~~or has outsourced the internal audit function to ..... who are considered suitably qualified and experienced for the purpose and are conversant with the policies and procedures of the insurer and they (or their representatives) are involved in the internal functions on a regular basis.~~
20. The Chief Executive Officer [Yes] Chief Financial Officer [Yes]. Compliance Officer [vacant] and the Head of Internal Audit [vacant] possess such qualification and experience as is required under the Code of Corporate Governance for Insurers, 2016. ~~The Appointed Actuary of the insurer (if any) also meets the conditions as laid down in the said Code.~~ Moreover, the persons heading the underwriting, claim, reinsurance risk management and grievance functions department posses qualification and experience of direct relevance to their respective functions as required under section 12 of the Insurance Ordinance 2000 (Ordinance No. XXXIX of 2000)

| Name of the Person   | Designation             |
|--|-------------------------|
| Mr. Khalid Hamid   | Chief Executive Officer |
| Mr. Fahad Sultan w.e.f. 12-04-2023<br>w.e.f. 2204-2024   | Acting CFO<br>CFO       |
| Mr. Bilal Ali Zafar w.e.f. 21-06-2021 till 05-01-2023  | Compliance              |
| Mr. Furrukh Majeed Qureshi w.e.f. 17-11-2016 till 11-08-2023<br>Mr. Bilal kully additional charge for Company Secretary w.e.f. 11-08-2023  | Company Secretary       |
| 1. Mr. Altaf Madraswala. General Manger (Operations)- Head Officer:<br>2. Mr. Awais Acting GM /ZH (SZ)<br>3. Mr. Zahid Qadeer, General Manager/ Zonal Head (Central Zone).<br>4. Mr. Khurram Irshad General Manager/ Zonal Head (North Zone) | Head of Underwriting    |
| 5. Mr. Altaf Madraswala. General Manger (Operations)- Head Officer:<br>6. Mr. Awais Acting GM /ZH (SZ)<br>7. Mr. Zahid Qadeer, General Manager/ Zonal Head (Central Zone).<br>1. Mr. Khurram Irshad General Manager/ Zonal Head (North Zone) | Head of Claims          |
| Mr. Usman Ghani joined as GM (Re-insurance) w.e.f. 30-04-2021.   | Head of Reinsurance     |
| None   | Head of Risk Management |
| No dedicated grievance department  | Head of Grievance Dept. |

NOTE: In case there is any Change in appointment of any person to act as Chief Executive Officer, Chief Financial Officer, Compliance Officer, Actuary, Company Secretary, Head of Internal Audit or during the reporting year should be adequately disclosed here with cogent reason(s) for such change.

22. The statutory auditors [for the year 2023] of the insurer have been appointed from the panel of Auditors approved by the Commission in terms of section 48 of the Insurance Ordinance, 2000 (Ordinance No XXXIX of 2000). The statutory auditors has confirmed that they have been given a satisfactory rating under the Quality Control Review programme of the Institute of Chartered Accountants of Pakistan, that they or any of the partners of the firm, their spouses and minor children do not hold shares of the Insurer and that the firm and all its partners are in compliance with the International Federation of Accountants (IFAC) guidelines on code of ethics as adopted by the Institute of Chartered Accountants of Pakistan.
23. The statutory auditors or the persons associated with them have not been appointed to provide other services, and the auditors have confirmed that they have observed IFAC guidelines in this regard.
24. The Board ensures that the investment policy of the insurer has been drawn up in accordance with the provisions of the Code of Corporate Governance for Insurers, 2016.
25. The Board [could not] ensure that the risk management system of the insurer is in place as per the requirements of the Code of Corporate Governance for the insurer 2016.
26. The Insurer has [not] set up a risk management function departments, which carries out its tasks as covered under the Code of Corporate Governance for Insurers, 2016.
27. The Board [could not] ensure that as a part of the risk management system, the insurer [could not] gets itself rated from a (credit rating agency) which [could have been] ~~is being~~ used by its risk management function/ department and the respective Committee as a risk monitoring tool. The rating assigned by the said rating agency ..... (date) is ..... (rating) with ..... outlook.
28. The Board has [not] set up a [dedicated] grievance department / function, which fully complies with the requirements of the Code of Corporate Governance for Insurers 2016, [However, Head of each three zones of the insurer have been designated as a focal persons for handling policy holder's complaints].
29. The insurer has [tried to] obtain exemptions from the Securities and Exchange Commission of Pakistan in respect of the following requirement(s) of the Code of Corporate Governance for Insurers, 2016:
  - The Company, vide its letters stated that the Board of Directors and the management of the Company is constantly striving to regularize its accounts of the previous year even when the current Board was not in place. Moreover, it was also stated that it is an established fact that unless and until all accounts till date are audited, finalized. Signed by the directors of a company and approved by the shareholders credit rating agencies do not entertain requests for assignment of rating to that company. And, due to non-availability of the Board during the last many years. The account of the company for the previous years (i.e.) from 2017 and onwards have yet to be audited. Finalized signed and approved. But, the current Board of the company is consistently trying to resolve this issue which will obviously take some time. Then it was requested to accord relaxation of the above referred clause (xxxi) of the 2016 Code including all other Clause with regard to adhering the statutory timeline relating directly or indirectly to audit, finalization, signing and or approval of the account and supplementary statements thereon in terms of clause (xxxi) of the aforementioned 2016 code. However SECP vide its letter No.ID OSM NICL 20178220 dated January 20, 2017 declined the request of the company on the basis of the reason that SECP has already issued direction followed by show cause Notice on the relevant violations stated in the said letter.

30. We confirm that all other material principles contained in the Code of Corporate Governance for insurers, 2016 have been complied with except for the following, towards which reasonable progress is being made by the insurer to seek compliance by the end of next accounting year:

| clause               | Brief Description of the Clause  | Compliance Status   |
|----------------------|--|---|
| (Viii) & (ix)        | Casual Vacancy in the board (Timeframe for filling up casual vacancy and approval by the Commission)   | <p>The Board of Directors finished their 3 year term on 30-05-2021 and after this date NICL remained functional without the Board of Director till reconstitution of New Board on 08-08-2023, The new Board of Director were later appointed by the Federal Government vide Notification No. 15(1)/2023-AOs-HR dated 08-08-2023 in exercising its power conferred under Section 1(d)&amp;(e), Section 3, Section 10(2)(a)&amp;(b), Section 12 and 13 of State-Owned Enterprises (Governance &amp; Operations) Act, 2023.</p> <p>Furthermore, there were no casual vacancy in the year 2023.</p>   |
| (xi)(b), (c) and (d) | Responsibilities, powers Functions of the Board of Directors. (Adoption of mission/vision statement and overall corporate strategy, formulation of significant policies, and establishment of sound internal controls) | <p>Mission statement of the company exists however, vision statement as well as new mission statement and the <b>Corporate Strategy</b> of the company wasn't developed in the year 2023. The current status is that BoD is reviewing the Vision and Mission Statement.</p> <p>Moreover, the status of the significant policies by the end of the year 2023 is as under.</p> <ol style="list-style-type: none"> <li>Product development - No new products were developed, as existing products met the needs of the policyholders:</li> <li>Underwriting procedures - KPMG, being the consultant of the company has developed the underwriting policy manual for the company which is in process of approval from the BoD.</li> <li>Claim lodging and claim settlement procedures - KPMG, being the consultant of the Company has developed the claim settlement policy manual for the company which was duly approved by the BoD in its 116<sup>th</sup> Meeting held on 27-04-2021.</li> <li>Policy servicing - will be covered under the underwriting policy / Claim Settlement policy manuals:</li> <li>Reinsurance policy - KPMG, being the consultant of the company has developed the reinsurance policy manual for the company which will be submitted to the current BoD for its approval.</li> <li>Risk management - KPMG being the consultant of the Company, has developed the Risk Management policy for the company, which has</li> </ol> |

| clause  | Brief Description of the Clause  | Compliance Status   |
|---------|--|---|
|         |  | <p>already been <b>recommended</b> by the Risk Management &amp; Compliance committee and shall be submitted to the current Board for approval.</p> <p>g. Procurement of goods and services – Board has subsequently approved the procurement policy in 103<sup>rd</sup> Board meeting held on February 23, 2019.</p> <p>h. Marketing – not required for the company, as it has a <b>captive clientele</b>:</p> <p>i. Determination of terms of credit and discount to customers – Approved by the relevant competent authority on a case-by-case basis:</p> <p>j. Premium collection and recovery of receivable premium – shall be covered under the underwriting policy manual, which is being made by KPMG:</p> <p>k. Write off of bad / doubtful debts, advances and receivables – Doubtful receivables are written off (if required) on a case-to-case basis by the relevant competent authority.</p> <p>l. Agency management – the company has no agents so far; hence, no requirement for this policy is there:</p> <p>m. Acquisition disposal of fixed assets – Already determined in the delegation of financial and administrative authorities duly approved by the Board:</p> <p>n. Donations, Charities, contributions and other alike payment - CSR policy was approved by the Board in the year 2019:</p> <p>o. Transaction or contracts with associated companies and related parties – Policy for related party Transactions was approved by the Board in its 112<sup>th</sup> meeting held on 30 September, 2020.</p> <p>p. Health, safety and environment – Real Estate Department looks after the safety, security and overall working conditions (including sanitization and fumigation etc) across all premises of the company; however, no formal policy is in place due to the fact that the company's Core business has impact on health, safety and environment.</p> <p>Delegation of financial / administrative authorities and other policies determine the level of materiality / thresholds w.r.t. approval and exercise of powers by various officials / competent forums.</p> |
| (xi)(f) | Responsibilities, Powers and functions of Board of Directors (Comprehensive proxy voting policy for institutional investors) | The company for practical purpose does not have institutional investors.  |

| clause                    | Brief Description of the Clause   | Compliance Status   |
|---------------------------|---|---|
| (xiii)                    | Internal Control (Aspects of system of internal control to be implemented at all levels)  | <p>Given the company remained without a full-time board for quite a long period the internal controls are improving / evolving with the passage of time. By the end year 2019, the company hired a dedicated and a qualified person as Chief Internal Auditor who was heading the internal Audit Department and during October 2020 a qualified person also joined the company as the Chief Financial Officer the incumbent resigned from services during Nov, 2021. A competent compliance officer was also hired during 2021 who later on resigned from services on 07-03-2023.</p> <p>In order to strengthen the Internal Controls 1 Manager and 2 Deputy Managers were also hired. New policies and procedures have been developed while some are in the pipeline, which will be approved soon. Board has segregated the functions of Internal Audit (Pre-Audit and Post-Audit), and in response to the new legislative changes, Moreover, assets are being segregated tagged and properly recorded, with a view to safeguard the assets of the company, compliance issues are being taken up by the board through relevant committees, company's authorized signatories have been determined and approved by the Board. Insurance committees have been formulated to maintain oversight over the Company's core business activities.</p> |
| (xviii)                   | Significant Issue to be placed for Decision by Board of Directors   | <p>Once the accounts are updated budgets and annual business plan in line with the approved budget shall be considered by the Board. Moreover, quarterly operating results shall also be considered once all accounts are updated , new Chief Financial Officer has also assumed the charge of the company in 2024, who shall attend the Board meeting (expect where he is not required to attend )</p> <p>The internal audit reports shall be considered on a regular basis.</p>   |
| (xx)<br>(xxi) &<br>(xxii) | <p>Chief Financial Officers Company Secretary and Head of Internal Audit (Appointment and approval)</p> <p>Qualification of Chief Financial Officer and Head of Internal Audit.</p> | <p>Mr. Farrukh Majeed Qureshi joined the company as Company Secretary in December 2016 and resigned from services w.e.f. 11-08-2023. Mr. Bilal Kully was given the additional responsibilities of Company Secretary w.e.f. 11-08-2023 till further orders. Mr. Fahad Sultan joined the company in December 2019 as Chief Internal Audit of the Company.</p> <p>A full time Chief Executive Officer was appointed during the year 2021. Mr. Khalid Hamid joined NICL on 24 May, 2021.</p> <p>The Chief Internal Auditor who joined the company in December 2019 and has now been given the responsibilities of the CFO in 2024; recently the BoD</p>   |

| clause                  | Brief Description of the Clause  | Compliance Status  |
|-------------------------|--|--|
|                         |  | has initiated the process to hire new CIA.<br><br>The Board did select a qualified person as the CFO of the company (Mr. Qasim Rasheed) in October 2020, who resigned from services in Nov, 2021.  |
| (xxv)                   | Frequency of Financial Reporting (preparation and circulation of quarterly unaudited financial statements and half-yearly reviewed financial statement along with Directors Report)                              | Quarterly financial statements along with Directors Report shall be prepared and circulated once all pending accounts are updated.   |
| (xxvi)                  | Frequency of Financial reporting (Review of half-yearly financial statements by the statutory auditors)  | Half- yearly financial statements shall be prepared and reviewed by the auditors once all pending accounts are updated.  |
| (xxvii)                 | Frequency of financial reporting (Circulation of annual audited financial Statements)  | Pending accounts are being updated.  |
| (xxviii)                | Annual Reviews and compliance procedures   | Strategies on various matters are considered by the Board Keeping in view the risks outcomes of the operational performance of the Company on an ongoing basis. No conflicts of interest w.r.t officers exit as all keys officers are whole-time employees of the company and no instance of their relationships with vendors or policy holders has so far been reported. However, the company has one director who is a serving Executive Director of the state life insurance corporation of Pakistan and whose relationship with the company's client (State life insurance) was disclosed to the Board and documented. |
| (xxix) (xxx) & (xxxiii) | Compliance Officer (Adoption of Compliance program, appointment of and assignment of duties to Compliance officer: reporting line of the Compliance officer and duties & responsibilities of Compliance Officer) | The position of compliance officer was filled in 2021. The Company appointed Mr. Bilal Ali Zafar as compliance officer in April 2021 who resigned from services in March, 2023, some progress has been on the subject assignments. The board will again advertise the position of compliance officer.  |
| (xxix) (xxx) & (xxxiii) | Responsibilities for Financial reporting and Corporate Compliance  | The enclosed Financial Statements were signed by the Current CEO as well as the Current Chief Financial Officer before the same were placed before the audit committee and the Board. The Board shall authorize the signing of financial statements for issuance and circulation in accordance with Section 51 of the Insurance Ordinance 2000.<br>Secretarial Compliance certificate is enclosed herewith.  |
| (xliii)                 | Management Committees  | The Board has formulated the management committee: however during the year under consideration. The committees did not meet on a quarterly basis. Terms of reference have been   |

| clause                        | Brief Description of the Clause                                    | Compliance Status  |
|-------------------------------|--|--|
|                               |  | approved by the Board for these committees. The committee endeavor to meet on a regular / basis.   |
| (xliii)                       | Board Committees   | The Board has formulated the board committee; however during the year under consideration, the committees did not meet on a quarterly basis. The committee endeavor to meet on a regular / need basis. Composition attendance at the meeting and terms of reference of the investment Committee and the Audit Committee are now in accordance with the code.   |
| (lviii) & (lix)               | Internal Audit   | A qualified individual was appointed as Chief Internal Auditor who joined the Company in December 2019 and is recently assigned the responsibility CFO of the company in 2024. During the year 2021 in order to strengthen the Audit function 1 Manager (Internal Audit) and 2 Deputy Managers (Internal audit) were also hired. Internal Audit reports were also prepared during the tenure as new CIA.<br>The BoD has decided to fill the vacant position for the CIA.   |
| (xxxiii) r/w (lx) to (ixviii) | External Auditors  | External Auditors for the year to which these financial statements related were appointed subsequent to that rotation of external auditors and other provisions relating to external auditors have been observed.  |
| (lxix)                        | Risk Management System   | Underwriting / insurance risk are accounted for through effective underwriting as well as proper reinsurance arrangements. The Company has remained highly solvent and has a good portfolio of investments spread across various categories.<br>Blueprint of the Risk Management Development has been recommended by the Risk Management & Compliance Committee for approval, which is being / shall be approved by the Board.<br>The BoD has decided to fill the vacant position for the Head of Risk Management. |
| (lxx) & (lxxi)                | Risk Management Function Department                                | The Board has recently approved the blueprint of the Risk Management Development and Risk Management policy in its 103 <sup>rd</sup> meeting dated 23-02-2019 and has also been recommended by the Risk Management & Compliance Committee for approval, which is being / shall be approved by the Board.<br>The BoD has decided to fill the vacant position for the CIA.   |
| (lxxii)                       | Rating by a Credit Rating agency                                   | Once the accounts are updated Credit rating shall be obtained.   |
| (lxxiii)                      | Actuary  | The position Actuary during 2023 remained vacant in NICL.  |
| (lxxiv) & (lxxv)              | Grievance Function (Establishment of & procedure for the Grievance | Currently, the Company has three zones across Pakistan and each Zonal Head has been designated   |

| clause             | Brief Description of the Clause   | Compliance Status  |
|--------------------|---|--|
|                    | Function of an insurer) & Claims Settlement Committee to oversee  | as focal person to look into the complaints of the policyholders. Complaints received from the policyholders of any are / shall be reported to the claim settlement committee. |
| (lxxvi) & (lxxvii) | Compliance with the code of Corporate Governance (Preparation & circulation of the reviewed statement of compliance with best Practices of corporate Governance along with annual report) | The instant statement is being prepared and circulated after review by the external auditors.  |

*By Order of the Board*



Farman Zarkoon  
Chief Executive Officer

Dated: 18 APR 2025

<sup>1</sup> A full time Chief Executive Officer was appointed during the year 2021. Mr. Khalid Hamid joined NICL on 24-05-2021 as Chief Executive Officer of the insurer and is still in position.

<sup>2</sup> Code of Conduct including conflict of interest policy was prepared and circulated among the Board members which was approved by the Board of NICL in its 93th meeting held on March 04, 2017 Previously, Code of conduct was in place as one of the chapters of NICL Human Resource Manual.

<sup>3</sup> The whole-time company secretary joined in December 2016. A qualified and experienced chartered accountant has been hired as the Chief Internal Auditor of company in year Dec, 2019 and was recently assigned the responsibilities of Acting CFO w.e.f 12-04-2023 dully regularized by the BoD w.e.f. 22-04-2024; however, the present Board has finally decided to initiate the process of hiring a Chief Internal Auditor of the Company. The position has also been advertised.

<sup>4</sup> The Board further resolved, in its 94<sup>th</sup> meeting held on May 06, 2017, that there shall be no Nomination committee, and the role of the said Committee shall be discharged by the Board itself. Furthermore, the Board also resolved that the Ethics, Human Resource & Remuneration Committee shall also look into the matter relating to IT.



## NATIONAL INSURANCE COMPANY LIMITED

Statement of Compliance with the  
Public Sector Companies (Corporate Governance) Rules, 2013

Name of company  
Name of the line Ministry:  
For the year ended:

NATIONAL INSURANCE COMPANY LIMITED  
Ministry of Commerce & Textile  
December 31, 2023

- I. This statement is being presented to comply with the Public Sector Companies (Corporate Governance) Rules, 2013 (hereinafter called "the Rules") issued for the purpose of establishing a framework of good governance, whereby a public sector company is managed in compliance with the best practices of public sector governance
- II. The company has complied with the provisions of the Rules in the following manner:

| S. No                               | Provision of the Rules  | Rule no.                   | Y              | N                   |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|-------------------------------------|---|----------------------------|----------------|---------------------|-----------------------|-----------------|----------------------------|--------------------|----------------------------|----------------------|----------------------------|----------------------------------|----------------------------|--|-----------------------------|----------------------------|----------------------------------|--------------------------|----------------------------|-------------------------------------|-------------------|----------------------------|-------------------|----------------------------|-----------------------|----------------------------|------|----------------|--|
| 1                                   | The independent directors meet the criteria of independence, as defined under the Rules.  | 2 (d)                      | ✓              |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 2                                   | The Board has at least one-third of its total members as independent directors. At present [i.e. as at December 31, 2023] the Board includes: <table><tr><th>Category</th><th>Names</th><th>Date of Appointment</th></tr><tr><td rowspan="4">Independent Directors</td><td>1. Mr. Ali Syed</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td>2. Mr. Abid Sattar</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td>3. Mr. Shahid Sattar</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td>4. Mr. Sahibzada Rafat Raoof Ali</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td></td><td>5. Mr. Muhammad Jaffer Raza</td><td>08-08-2023 till 27-01-2025</td></tr><tr><td>Executive Directors / Ex-Officio</td><td>1. Mr. Khalid Hamid(CEO)</td><td>24-05-2021 till 10-03-2025</td></tr><tr><td rowspan="3">Non-Executive Directors/ Ex-Officio</td><td>1. Syed Hamid Ali</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td>2. Dr. Aftab Imam</td><td>08-08-2023 till 07-08-2026</td></tr><tr><td>3. Dr. Iftikhar Amjad</td><td>08-08-2023 till 07-08-2026</td></tr></table> | Category                   | Names          | Date of Appointment | Independent Directors | 1. Mr. Ali Syed | 08-08-2023 till 07-08-2026 | 2. Mr. Abid Sattar | 08-08-2023 till 07-08-2026 | 3. Mr. Shahid Sattar | 08-08-2023 till 07-08-2026 | 4. Mr. Sahibzada Rafat Raoof Ali | 08-08-2023 till 07-08-2026 |  | 5. Mr. Muhammad Jaffer Raza | 08-08-2023 till 27-01-2025 | Executive Directors / Ex-Officio | 1. Mr. Khalid Hamid(CEO) | 24-05-2021 till 10-03-2025 | Non-Executive Directors/ Ex-Officio | 1. Syed Hamid Ali | 08-08-2023 till 07-08-2026 | 2. Dr. Aftab Imam | 08-08-2023 till 07-08-2026 | 3. Dr. Iftikhar Amjad | 08-08-2023 till 07-08-2026 | 3(2) | ✓ <sub>1</sub> |  |
| Category                            | Names   | Date of Appointment        |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| Independent Directors               | 1. Mr. Ali Syed   | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 2. Mr. Abid Sattar  | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 3. Mr. Shahid Sattar  | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 4. Mr. Sahibzada Rafat Raoof Ali  | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 5. Mr. Muhammad Jaffer Raza   | 08-08-2023 till 27-01-2025 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| Executive Directors / Ex-Officio    | 1. Mr. Khalid Hamid(CEO)  | 24-05-2021 till 10-03-2025 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| Non-Executive Directors/ Ex-Officio | 1. Syed Hamid Ali   | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 2. Dr. Aftab Imam   | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
|                                     | 3. Dr. Iftikhar Amjad   | 08-08-2023 till 07-08-2026 |                |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 3                                   | The directors have confirmed that none of them is serving as a director on more than five Public Sector Companies and listed Companies simultaneously, except their subsidiaries.   | 3(5)                       | ✓              |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 4                                   | The appointing authorities have applied the fit and proper criteria given in the Annexure to the Rules in making nominations of the persons for election as Board members under the provision of the Act.   | 3(7)                       | ✓              |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 5                                   | The chairman of the Board is working separately from the Chief Executive Officer of the company.  | 4(1)                       | ✓ <sub>2</sub> |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 6                                   | The chairman has been elected by the Board of Directors except where Chairman of the Board has been appointed by the Government of Pakistan.  | 4(4)                       | ✓              |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |
| 7                                   | The Board has evaluated the candidates for the position of the Chief Executive on the basis of the fit and proper criteria as well as the guidelines specified by the Commission.   | 5(2)                       | ✓              |                     |                       |                 |                            |                    |                            |                      |                            |                                  |                            |  |                             |                            |                                  |                          |                            |                                     |                   |                            |                   |                            |                       |                            |      |                |  |



## NATIONAL INSURANCE COMPANY LIMITED

|    |   |                                     |  |                          |
|----|---|-------------------------------------|--|--------------------------|
| 8  | <p>(a) The Company has prepared a "Code of Conduct" to ensure that professional standards and corporate values are in place.</p> <p>(b) The Board has ensured that appropriate steps have been taken to disseminate it throughout the company along with its supporting policies and procedures, including posting the same on the company's website.<br/> <a href="https://nicl.com.pk/wp-content/uploads/2022/03/APPROVED-CODE-OF-CONDUCT_0.pdf">https://nicl.com.pk/wp-content/uploads/2022/03/APPROVED-CODE-OF-CONDUCT_0.pdf</a></p> <p>(c) The Board has set in place adequate systems and controls for the identification and redressed of grievances arising from unethical practices.</p> | 5(4)                                | <p>✓<sub>3</sub></p> <p>✓<sub>4</sub></p> <p>✓</p> |                          |
| 9  | The Board has established a system of sound internal control, to ensure compliance with the fundamental principles of probity and propriety; objectives, integrity and honesty; and relationship with the stakeholders, in the manner prescribed in the Rules.  | 5(5)                                |  | ✓                        |
| 10 | The Board has developed and enforced an appropriate conflict of interest policy to lay down circumstances or considerations when a person may be deemed to have actual or potential conflict of interests, and the procedure for disclosing such interest.  | 5(5)<br>(b)(ii)                     | ✓ <sub>5</sub>                                     |                          |
| 11 | The Board has developed and implemented a policy on anti-corruption to minimize the actual and perceived corruption in the Company.   | 5(5)<br>(b)(vi)                     | ✓ <sub>6</sub>                                     |                          |
| 12 | The Board has ensured equality of opportunity by establishing open and fair procedures for making appointments and for determining terms and conditions of service.   | 5(5)<br>(c)(ii)                     | ✓ <sub>7</sub>                                     |                          |
| 13 | The Board has ensured compliance with the law as well as the company's internal rules and procedures relating to public procurement, tender regulations, and purchasing, and technical standards, when dealing with suppliers of goods and services.  | 5(5)<br>(c)(iii)                    | ✓ <sub>8</sub>                                     |                          |
| 14 | The Board has developed a vision or mission statement and corporate strategy of the company.  | 5(6)                                |  | ✓ <sub>9</sub>           |
| 15 | The Board has developed significant policies for the company. A complete record of significant policies along with the dates, on which they were approved or amended, has been maintained.  | 5(7)                                |  | ✓ <sub>10</sub>          |
| 16 | The Board has quantified the outlay of any action in respect of any service delivered goods sold by the Company as public service obligation, and has submitted its request for appropriate compensation to the Government for consideration.   | 5(8)                                | N/A  |                          |
| 17 | The Board has ensured compliance with policy directions requirements received from the Government.  | 5(11)                               |  | ✓                        |
| 18 | <p>(a) The Board has met at least four times during the year.</p> <p>(b) Written notices of the Board meetings, along with agenda and working papers were circulated at least seven days before the meetings.</p> <p>(c) The minutes of the meetings were appropriately recorded and circulated.</p>  | <p>6(1)</p> <p>6(2)</p> <p>6(3)</p> | <p></p> <p>✓</p> <p>✓</p>                          | <p>✓</p> <p></p> <p></p> |
| 19 | The Board has monitored and assessed the performance of Senior management on Annual/half-yearly/quarterly basis* and held them accountable for accomplishing Objectives, goals and key performance indicators set for this purpose.<br>*Strike whichever is not applicable.   | 8(2)                                |  | ✓ <sub>11</sub>          |
| 20 | The Board has reviewed and approved the related party transactions placed before it after recommendations of the audit committee. A party wise record of transactions entered into with the related parties during the year has been maintained.  | 9                                   | ✓  |                          |



## NATIONAL INSURANCE COMPANY LIMITED

| 21                                      | (a) The Board has approved the profit and loss account for, and balance sheet as at the end of the first, second and third quarter of the year as well as the financial year end.<br><br>(b) In case of listed PSCs, the Board has prepared half yearly accounts and undertaken limited scope review by the auditors.<br><br>(c) The Board has placed the annual financial statements on the company's website.  | 10   |                   | ✓ <sup>12</sup> |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
|---|--|--|-------------------|-----------------|-----------------|----|-------------------------------|---------------------------|----|---------------|---|----|-------------------|-----------------------|----|--------------------------|------------------------------------|---------|--|----|------------------------------|
| 22                                      | All the Board members underwent an orientation course arranged by the company to apprise them of the material developments and information, as specified in the Rules.   | 11   | ✓ <sup>13</sup>   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 23                                      | a) The Board has formed the requisite committees, as specified in the Rules.<br><br>(b) The committees were provided with written term of reference defining their duties, authority and composition<br>(c) The minutes of the meetings of the committees were circulated to all the Board members.<br><br>(d) The committees were chaired by the following non-executive directors:<br><table><tr><th>Committee</th><th>Number of Members</th><th>Name of Chair</th></tr><tr><td>Audit Committee</td><td>05</td><td>Mr. Sahibzada Rafat Raoof Ali</td></tr><tr><td>Risk Management Committee</td><td>11</td><td>----None-----</td></tr><tr><td>Human Resources Committee<sup>14</sup></td><td>04</td><td>Mr. Shahid Sattar</td></tr><tr><td>Procurement Committee</td><td>04</td><td>Mr. Muhammad Jaffer Raza</td></tr><tr><td>Nomination Committee <sup>15</sup></td><td>--Nil--</td><td>--None--<br/>The Board is performing the role of Nomination Committee</td></tr></table> | Committee  | Number of Members | Name of Chair   | Audit Committee | 05 | Mr. Sahibzada Rafat Raoof Ali | Risk Management Committee | 11 | ----None----- | Human Resources Committee <sup>14</sup> | 04 | Mr. Shahid Sattar | Procurement Committee | 04 | Mr. Muhammad Jaffer Raza | Nomination Committee <sup>15</sup> | --Nil-- | --None--<br>The Board is performing the role of Nomination Committee | 12 | ✓<br><br>✓<br><br>✓<br><br>✓ |
| Committee                               | Number of Members  | Name of Chair  |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| Audit Committee                         | 05   | Mr. Sahibzada Rafat Raoof Ali  |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| Risk Management Committee               | 11   | ----None-----  |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| Human Resources Committee <sup>14</sup> | 04   | Mr. Shahid Sattar  |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| Procurement Committee                   | 04   | Mr. Muhammad Jaffer Raza   |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| Nomination Committee <sup>15</sup>      | --Nil--  | --None--<br>The Board is performing the role of Nomination Committee |                   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 24                                      | The Board has approved appointment of Chief Financial Officer, Company Secretary and Chief Internal Auditor by whatever name called with their remuneration and terms and conditions of employment.  | 13   | ✓ <sup>16</sup>   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 25                                      | i. Chief Financial Officer and<br>ii. Company Secretary<br>have requisite qualification prescribed in the Rules.   | 14   | ✓ <sup>17</sup>   | ✓ <sup>16</sup> |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 26                                      | The company has adopted international Financial reporting Standards notified by the Commission in terms of sub-section (1) of section 225 of the Act.  | 16   | ✓                 |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 27                                      | The directors' report for this year has been prepared in compliance with the requirements of the Act and the Rules and fully describes the salient matters required to be disclosed.   | 17   | ✓ <sup>18</sup>   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 28                                      | The directors, CEO and executives, or their relatives, are not, directly or indirectly, concerned or interested in any contract or arrangement entered into by or on behalf of the company except those disclosed to the company.  | 18   | ✓ <sup>19</sup>   |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 29                                      | (a) A formal and transparent procedure for fixing the remuneration packages of individual directors has been set in place and no director is involved in deciding his own remuneration.<br><br>(b) The annual report of the company contains criteria and details of remuneration of each director   | 19   | ✓<br><br>✓        |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |
| 30                                      | The financial statements of the Company were duly endorsed by the Chief Executive officer and Chief Financial Officer before consideration and approval of the Audit Committee and the Board.  | 20   | ✓                 |                 |                 |    |                               |                           |    |               |   |    |                   |                       |    |                          |                                    |         |  |    |                              |



## NATIONAL INSURANCE COMPANY LIMITED

| 31                            | The Board has formed an audit Committee with defined and written terms of reference, and having the following members.   | 21(1) and                         | ✓        |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|-------------------------------|--|-----------------------------------|----------|-------------------------|-------------------------------|----------------------|---------------------|--------------------|-------------------------------------|-----------------------------------|-------------------|----------------------|---------------------|----------------|-------------------------------------|-----------------------------------|--------------------------|----------------------|--------|-------|---|--|
|                               | <table><tr><th>Name of Director</th><th>Category</th><th>Professional Background</th></tr><tr><td>Mr. Sahibzada Rafat Raoof Ali</td><td>Independent Director</td><td>Professional Banker</td></tr><tr><td>Mr. Syed Hamid Ali</td><td>Non-Executive Director / Ex-officio</td><td>Civil Servant, Government Service</td></tr><tr><td>Dr. Shahid Sattar</td><td>Independent Director</td><td>Professional Banker</td></tr><tr><td>Mr. Aftab Imam</td><td>Non-Executive Director / Ex-officio</td><td>Civil Servant, Government Service</td></tr><tr><td>Mr. Muhammad Jaffer Raza</td><td>Independent Director</td><td>Lawyer</td></tr></table> | Name of Director                  | Category | Professional Background | Mr. Sahibzada Rafat Raoof Ali | Independent Director | Professional Banker | Mr. Syed Hamid Ali | Non-Executive Director / Ex-officio | Civil Servant, Government Service | Dr. Shahid Sattar | Independent Director | Professional Banker | Mr. Aftab Imam | Non-Executive Director / Ex-officio | Civil Servant, Government Service | Mr. Muhammad Jaffer Raza | Independent Director | Lawyer | 21(2) | ✓ |  |
| Name of Director              | Category   | Professional Background           |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| Mr. Sahibzada Rafat Raoof Ali | Independent Director   | Professional Banker               |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| Mr. Syed Hamid Ali            | Non-Executive Director / Ex-officio  | Civil Servant, Government Service |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| Dr. Shahid Sattar             | Independent Director   | Professional Banker               |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| Mr. Aftab Imam                | Non-Executive Director / Ex-officio  | Civil Servant, Government Service |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| Mr. Muhammad Jaffer Raza      | Independent Director   | Lawyer                            |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|                               | The Chief Executive and Chairman Board are not members of the Audit Committee.   |                                   |          |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| 32                            | (a) The Chief Financial Officer, Chief Internal Auditor and a representative of external auditors attended all meetings of Audit committee at which issues relating to accounts and audit were discussed.  | 21(3)                             |          | ✓                       |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|                               | (b) The Audit Committee met the external auditors, at least once in a year, without the presence of Chief Financial Officer, the Chief Internal Auditor and other executives.  |                                   |          | ✓                       |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|                               | (c) The audit committee met the Chief Internal Auditor and other members of the internal audit function, at least once a year, without the presence of Chief Financial Officer and external auditor.   |                                   |          | ✓                       |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| 33                            | (a) The Board has set an effective internal audit function, which has an audit charter, duly approved by the audit committee. .  | 22                                |          | ✓ <sup>20</sup>         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|                               | (b) The Chief Internal Auditor has requisite qualification and experience prescribed in the Rules.   |                                   |          | ✓                       |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
|                               | (c) The internal audit reports have been provided to external auditors for their review.   |                                   |          | ✓                       |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| 34                            | The external auditors of the company have confirmed that the firm and all its partners are in compliance with International Federation of Accountants (IFAC) guidelines of Ethics as applicable in Pakistan.   | 23(4)                             | ✓        |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |
| 35                            | The Auditors have confirmed that they have observed the applicable guidelines issued by IFAC with regard to provision of non-audit services.   | 23(5)                             | ✓        |                         |                               |                      |                     |                    |                                     |                                   |                   |                      |                     |                |                                     |                                   |                          |                      |        |       |   |  |



## NATIONAL INSURANCE COMPANY LIMITED

<sup>1</sup>The 3-year term of the previous Board of Directors was completed on 30-05-2021, and the new Board was constituted on 08-08-2023.

The previous Board of Directors finished their 3 year term on 30-05-2021 and after this date NICL remained functional without the Board of Director till reconstitution of New Board on 08-08-2023, The new Board of Director were later appointed by the Federal Government vide Notification No. 15(1)/2023-AOs-HR dated in exercising its power conferred under Section 1(d)&(e), Section 3, Section 10(2)(a)&(b), Section 12 and 13 of State-Owned Enterprises (Governance & Operations) Act, 2023.

<sup>2</sup> New chairman of the Board was appointed on 13 Nov 2023 after constitution of the New Board of Director of NICL. A full-time Chief Executive Officer was appointed during the year 2021. Mr. Khalid Hamid joined NICL on 24-05-2021 as Chief Executive Officer of the insurer and who remained in position during the Year 2023.

<sup>3</sup> Code of Conduct (including Conflict of Interest Policy) was prepared and circulated among the Board members which was approved by the board of NICL in its 93<sup>rd</sup> meeting held on March 04, 2017. The Code was disseminated across the board among the employees, and is also placed on the website of the Company.

<sup>4</sup>Similar to the Code of Conduct, NICL's whistleblower policy was prepared and circulated among the Board members. This was approved by the Board of NICL its 93<sup>rd</sup> held on March 04, 2017. Moreover, every transaction in the company has been carried out after pre-audit of the respective payment voucher is done. More, Auditor General of Pakistan does carry out Government audits of each year, and any instance of concerns is reported by them at other constitutional forums like the Public Accounts Committee / Departmental Accounts Committee.

<sup>5</sup> Conflict of interest policies have been covered under NICL's Code of Conduct.

<sup>6</sup> NICL's Anti-Corruption / Anti-Fraud Policy was prepared and circulated among the Board members which was approved by the Board of NICL in its 93<sup>rd</sup> meeting held on March 04, 2017.

<sup>7</sup> HR Manual lays down the procedure for making appointments, which involves publication of the advertisement in the newspapers. However it is also to inform that the following positions were filled during the year 2023

- General Manager (Admin & Real Estate),
- Assistant Manager (Financial Reporting),
- Manager (ERP/iGIS),
- Assistant Manager (Claims),

<sup>8</sup>The Boards procurement Committee as well as Management's Central Procurement Committee (CPC) ensures that PPRA Rules are complied with.

<sup>9</sup>The Company already had a mission statement during 2023; however, the current Board of Directors is reviewing the management's proposed new Vision and Mission Statement of the company.

<sup>10</sup>Policies have been prepared and approved except in so far as mentioned in the statement of Non-Compliance (Schedule II).

<sup>11</sup> Detailed presentations on the performance of the Company including the performance of the CEO were given to the Board in its first few meetings.

<sup>12</sup> The Annual/ Quarterly/ Monthly Financial Statements for the year 2023 were not prepared during 2023. Furthermore during the tenure of the previous Board the Accounts / financial statements for the year 2015, 2016 & 2017 have been audited, signed and approved by them, which have been placed on the website of NICL, after constitution of new BoD w.e.f. 08-08-2023 the Accounts / financial statements for the year 2018, 2019, 2020, 2021& 2022 have been audited, signed and approved by them, which have also been placed on the website of NICL. Furthermore, the Accounts / financial



## NATIONAL INSURANCE COMPANY LIMITED

Statements for the years 2023 have now been audited and approved, which will be placed on the website once relevant AGM is held. Accounts / Financial statements for the remaining year 2024 will soon be audited and finalized by Audit / BoD.

<sup>13</sup> An in house orientations session / presentations / reading materials were arranged for the newly constituted Board of Directors in their first meeting.

<sup>14</sup> Human Resources Committee is called as the Ethics, Human Resource, Remuneration & IT Committee constituted in compliance with the Code of Corporate Governance for the insurer 2016 { S.R.O. 1045(1)/2016 dated November 05, 2016}.

<sup>15</sup> The Code of Corporate Governance for insurers, 2016 {S.R.O. 1045(1)/2016 dated November 05, 2016} allows an insurer that if its board does not want to constitute a nominations committee, the Board shall discharge the responsibilities of a nominations committee.

All committees have been formed except the nominations Committee as in the light of the code of corporate Governance for insurers 2016 {S.R.O. 1045(1)/2016 dated November 09, 2016} the board has the option not to constitute nomination committee and in case of it is not constituted, the Board shall perform the role of the said Committee According, the Board of NICL is discharging the role of the Nomination Committee.

<sup>16</sup> **Mr. Farrukh Majeed Qureshi** joined the company as **Company Secretary** in December 2016 with approval of the Board of Directors. His remuneration was also fixed by the then BoD. He resigned from the position during the year in review on 11-08-2023 later on an additional charge was then allowed to the **Mr. Bilal kully** in Aug, 2023 to till date.

**Mr. Fahad Sultan** joined the company in December 2019 as **Chief Internal Auditor** with approval of the Board of Directors. His remuneration was also fixed by the then BoD. He was then assigned the responsibilities of the Acting CFO on 12-04-2023 and later on regularized by the Board of Directors as CFO on 22-04-2024. The Board has initiated the process to fill the vacant position of CIA.

<sup>17</sup> The Acting CFO posses the requisite qualification prescribed in the rules.

<sup>18</sup> Director's Report has been attached to the balance sheet as at year ended December 31, 2023.

<sup>19</sup> Only one Board member is a nominee of State Life Insurance Corporation of Pakistan, which is a client of NICL. However, that Board member is not personally interested in any contract or agreement of NICL with State Life. This is well disclosed and documented.

<sup>20</sup> The Internal Audit Function was duly established by the Board; Internal Audit Manual was approved during the year 2021 with the Internal Audit Charter.

Farman Zarkoon  
Chief Executive Officer

Ali Syed  
Chairman of the Board



## NATIONAL INSURANCE COMPANY LIMITED

the Public Sector Companies (Corporate Governance) Rules, 2013  
FOR THE YEAR ENDED DECEMBER 31, 2023

Explanation for Non-Compliance with the  
Public Sector Companies (Corporate Governance) Rules, 2013

Name of Company National Insurance Company Limited  
Name of the line ministry: Ministry of Commerce & Textile  
For the year ended: December 31, 2023

We confirm that other material requirements envisaged in the Rules have been complied with except for the following toward which reasonable progress is being made by the company to seek compliance expectedly by the end of next accounting year.

| S. No. | Rule/ Sub-Rule No. | Reason for Non-Compliance  | Future Course of Action   |
|--------|--------------------|--|---|
| 1      | 3(4)               | No casual vacancy arose on the Board of Directors of the Company during the year 2023.   |   |
| 2      | 5(5)               | System of internal controls has already been strengthened by the Board and management of NICL; however, still a lot needs to be done to curb the expenses. Whistle blower Policy has been put in place. Chief Internal Auditor was also hired at the end of the year 2019. | <p>Similar to the Anti Corruption, Code of Conduct &amp; NICL's Whistleblower Policy was prepared and circulated among the Board member which was approved by the Board of NICL in its 93<sup>rd</sup> meeting held on March 04, 2017. Previously, there was no such mechanism in place. However, every transaction in the Company has been carried out after pre-audit of the respective payment voucher is done. Moreover, Auditor General of Pakistan does carry out Government audits of each year and any instance of concern is reported by them at other constitutional forums like the Public Accounts Committee / Departmental Accounts Committee.</p> <p>The System of internal controls is improving day by day. The Board and the Audit Committee intends to further strengthen the internal Audit Department.</p> <p>During the years 2021 &amp; 2022 Internal Audit conducted audits for the following departments.</p> <ul style="list-style-type: none"><li>• Operations</li><li>• Claims</li><li>• Human Resource &amp;</li><li>• Finance department.</li></ul> <p>Currently the CIA Position is vacant and has been advertised will soon be filled with the consent of the BoD.</p> |



## NATIONAL INSURANCE COMPANY LIMITED

|   |                       |  |   |
|---|-----------------------|--|---|
| 3 | 5(5)(b)(i)<br>v) & 18 | Register of interests is being maintained (commencing from the year 2023) to the Extent of directors in which directors disclose their interest prior to convening of a Board / Committee meeting. However, no register of interests was being maintained for executives during the year 2023. Executives (other than CEO) are perceived to have no impact on decision making at all financial authorities have already been delegated by the Board.   | Board of NICL is committed to make improvements in the internal control system, in doing so, Code of Conduct and Policy on Related Party Transactions have been put in place which cover conflict of Interest policy. Register of interests for executives / the management committees is now being maintained.   |
| 4 | 5(6)                  | The company has a mission statement which can be seen in the Annual Report for the year ended December 31, 2023.<br><br>However, the company has not developed a vision statement and corporate strategy for the company.  | The Company already had a mission statement during 2021; however, the current Board of Directors is reviewing the management's proposed new Vision and Mission Statement of the company   |
| 5 | 5(7)                  | Although the Board and its predecessors have formulated, approved and implemented various policies, but still, the following policies are required to be formulated:<br><br>a. The formal approval and adoption of the annual report of the Company including the financial statements - Law has already laid down a formal procedure for approval and adoption of financial statements. Considering that the financial statements for the year 2024 have yet to be prepared, audited, approved, signed and adopted, this policy shall be prepared.<br><br>b. Effective communication policy has yet to be formally laid down; however, Office Orders have been issued which ensure that all communication is routed through the office of the CEO.<br><br>c. Practice is there for the identification, monitoring and management of the principal insurance risks and opportunities; however, other enterprise risks have yet to be managed, which shall be looked after with the strengthening of the Internal Audit Department.<br><br>d. Procurement policy did not existed previously, as the | Board is considering and approving the annual accounts for the year 2023.<br><br>Effective communication policy shall be made in future, if need is felt.<br><br>Internal Audit Department has been strengthened; a new Chief Internal Auditor was hired who joined NICL in 2019 during his tenure has worked a lot on strengthening the internal controls under the guidance and supervision of BoD audit Committees. Post Audits of different departments were conducted by the CIA with his team during 2021 & 2022. The Board has initiated the process to hire New CIA for the Company after transfer of the previous CIA to the position of CFO.<br><br>Procurement policy has already been approved by the Board in its 103 <sup>rd</sup> meeting held on 23-02-2019 |



## NATIONAL INSURANCE COMPANY LIMITED

|   |       |   |   |
|---|-------|---|---|
|   |       | <p>management relied purely on the provisions of the PPRA laws for procurement etc.</p> <p>e. Marketing of goods to be sold or services to be rendered by the Company. The Company has a captive business, hence, marketing of its products is not required;</p> <p>f. Determination of terms of credit and discount to customers - The clients are public sector entities, which pay the premiums as per the past practice;</p> <p>g. Write-off of bad or doubtful debts. The Board decided on a case-by-case basis and Vances are receivables usually not basis, if so required done.</p> <p>h. Acquisition or disposal of fixed assets and investments - Proper delegation of financial and administrative authorities in place along with the provisions of the Companies &amp; Insurance law, Real Estate Administration Committee Procurement Committee used to look into matters relating to disposal or acquisition of fixed assets. The Investment Policy is in place and the Board's Investment Committee looks into the matters concerning investments. Accordingly, need for a formal policy was not felt;</p> <p>i. Corporate social responsibility initiatives including donations, charities, contributions and other payments of a similar nature.</p> <p>j. Health, safety and environment- The nature of business of the Company is that it offers intangible service/ product; hence this is not applicable.</p> | <p>So far not required</p> <p>Not required due to the fact that NICL has a renewal business and no new clients are attracted as such. However, cases are decided by the competent authorities on a case-by-case basis.</p> <p>The Board decides on a case-by-case. If required</p> <p>This is being effectively managed as of the date of filing of the statement.</p> <p>The management of NICL has taken CSR initiatives as part of NICL's image building, and a CSR Committee has also been constituted by the Board in its 06<sup>th</sup> Emergent meeting held on April 13, 2019. Moreover CSR Policy has been approved in the 109<sup>th</sup> BoD meeting held on 06-12-2019.</p> <p>Not Applicable. However, the company has a dedicated department to look after the safety, security and overall (including sanitization and fumigation etc) across the premises of the company.</p> |
| 6 | 5(10) | <p>The provision requiring the Board to define level of materiality is itself subjective in nature. However, it is all established that the committees analyze and review various day to day transactions and practices, and then make recommendations to the Board for its consideration. Moreover, the Board has</p>  | <p>The management shall review if there is any room for further defining the level of materiality. However, at present, the company has a threshold based delegation of financial and administrative authorities.</p>   |



## NATIONAL INSURANCE COMPANY LIMITED

|    |                   |   |  |
|----|-------------------|---|--|
|    |                   | already delegated various financial powers across different levels.   |  |
| 7  | 8                 | The performance evaluation of CEO and senior management was not conducted during the year 2023. A full time CEO was appointed during 2021 but the 3 years tenure of the BoD was completed after the appointment of new CEO. Senior management's performance is assessed through the Chief Executive Officer and / or the HR Committee.  | The Board did not evaluate the performance of senior management through the CEO and/or HR Committee.   |
| 8  | 9                 | During the year 2023, all related party transactions were not placed before the Audit Committee, as there were routine transactions with NICL's related party Ltd. However, it may be noted that the Government Auditors are currently carrying audit of all transactions / expenses / claims / payments.   | Policy on Related Party Transactions is approved by the Board in its 112 <sup>th</sup> Board meeting held on 30-09-2019, on the recommendation of the Audit Committee.   |
| 9  | 10,17,19 (4) & 24 | The Annual/ Quarterly/ Monthly Financial Statements for the year 2023 were not prepared during the year 2023. The financial statements / Annual Report of the Company for the years 2024 have not been prepared, audited, approved, signed and adopted which were required to be prepared and audited as per the timeline given in the Companies Act, 2017. Also, the Directors' Report was also not prepared and filed by the said timeline, which is essentially required to be annexed to every balance sheet. | At present, the Board has considered and approved the financial statements for the year ended December 31, 2023 along with all applicable deliverables.  |
| 10 | 13,14 & 15        | Mr. Fahad Sultan was given the Acting Charge for the position of CFO on 12-04-2023 was regularized on this position with the approval of the Board of Directors on 22-04-2024.  | The position for CIA remained vacant during the year 2023 and Additional charge for the position of Company Secretary was allowed to Mr. Bilal Kully.  |
| 11 | 20                | NICL did have a Chief Financial Officer as at the year ended December 31, 2023. However, financial statements were endorsed by the current Chief Executive and current CFO before submission to the current Audit Committee and the Board.  | The company now has qualified professional serving as the Chief Financial Officer of the company. Subsequent financial statements were signed by the current Chief Executive Officer and Chief Financial Officer before placing the same before the Audit Committee and the Board. |
| 12 | 22(3) & 22(4)     | Internal Audit Charter was approved by the Audit Committee during the year 2021   | The Internal Audit Manual is being approved by the Audit Committee and the Board in its 116 <sup>th</sup> Board meeting 27-04-2021 during the year. Audit Committee is rigorously taking up internal audit matters on top priority.  |

Farman Zarkoon  
Chief Executive Officer

Ali Syed  
Chairman

**NATIONAL INSURANCE COMPANY LIMITED  
UNCONSOLIDATED FINANCIAL STATEMENTS  
FOR THE YEAR ENDED  
DECEMBER 31, 2023**

**ASSURANCE DEPARTMENT**

## INDEPENDENT AUDITOR'S REPORT

To the members of National Insurance Company Limited

Report on the Audit of the Unconsolidated Financial Statements

### Qualified Opinion

We have audited the annexed financial statements of National Insurance Company Limited (the Company), which comprise the unconsolidated statement of financial position as at December 31, 2023 and the unconsolidated profit and loss account, the unconsolidated statement of comprehensive income, the unconsolidated statement of changes in equity and the unconsolidated statement of cash flows for the year then ended, and notes to the unconsolidated financial statements, including a summary of significant accounting policies and other explanatory information and we state that we have obtained all the information and explanations which, to the best of our knowledge and belief, were necessary for the purposes of the audit.

In our opinion and to the best of our information and according to the explanations given to us, the unconsolidated statement of financial position, the unconsolidated profit and loss account, the unconsolidated statement of comprehensive income, the unconsolidated statement of changes in equity and the unconsolidated statement of cash flows together with the notes forming part thereof, conform with the accounting and reporting standards as applicable in Pakistan and give the information required by the Insurance Ordinance, 2000 and the Companies Act, 2017 (XIX of 2017), in the manner so required however except for the effects of the matter described in the Basis for Qualified Opinion section of our report, these financial statements give a true and fair view of the state of Company's affairs as at December 31, 2023 and of the profit, total comprehensive income, the changes in equity and its cash flows for the year then ended.

### Basis for Qualified Opinion

We were appointed subsequent to the balance sheet date; consequently, we were unable to carry out auditing procedures necessary to obtain adequate assurance regarding the quantities and condition of investment properties and fixed assets appearing in the unconsolidated statement of financial position as at December 31, 2023 and application of appropriate cut off procedures. We were also unable to review the events subsequent to the balance sheet date till the date of our audit report, which may affect the financial statements. Further, there being no satisfactory alternative audit procedures that we could adopt to obtain sufficient and appropriate audit evidence regarding the objectives of these procedures. Consequently, we are unable to assess due impact of the adjustments, if any, that may have been identified as a result of such audit procedures on the balances as appearing in the unconsolidated financial statements;

We conducted our audit in accordance with International Standards on Auditing (ISAs) as applicable in Pakistan. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company in accordance with the International Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants* as adopted by the Institute of Chartered Accountants of Pakistan (the Code) and we have fulfilled our other ethical responsibilities in accordance with the Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

#### Information Other than the Financial Statements and Auditor's Report Thereon

Management is responsible for the Other Information. The other Information comprises the information included in the Company's Annual Report but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the Other Information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the Other Information and in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

#### Responsibilities of Management and Board of Directors for the Financial Statements

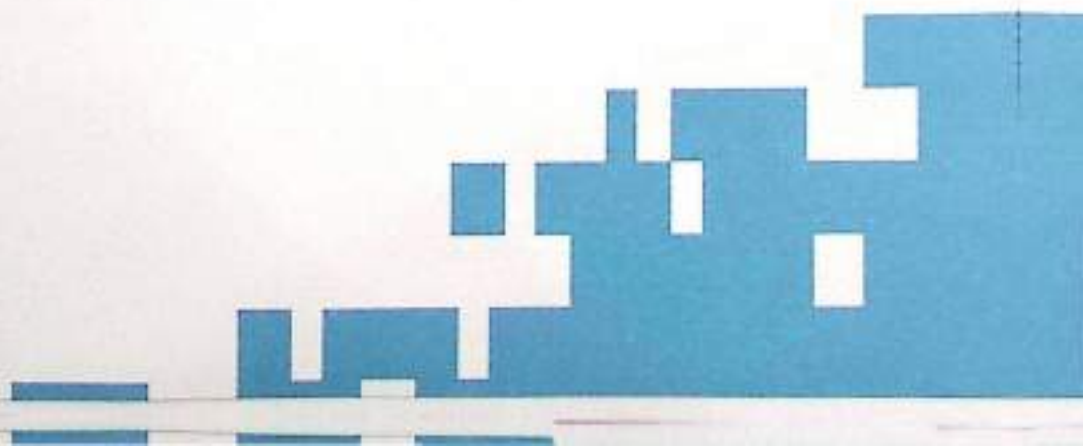
Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting and reporting standards as applicable in Pakistan and the requirements of Insurance Ordinance, 2000 and, Companies Act, 2017 (XIX of 2017), and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the company or to cease operations, or has no realistic alternative but to do so.

Board of directors are responsible for overseeing the Company's financial reporting process.

#### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs as applicable in Pakistan will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.



As part of an audit in accordance with ISAs as applicable in Pakistan, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the board of directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.


#### Report on Other Legal and Regulatory Requirements

Based on our audit, we further report that in our opinion:

- a) except for the matters described in the Basis for Qualified Opinion section of our report, proper books of account have been kept by the Company as required by the Insurance Ordinance, 2000 and the Companies Act, 2017 (XIX of 2017);
- b) except for the matters described in the Basis for Qualified Opinion section of our report, the unconsolidated statement of financial position, the unconsolidated statement of comprehensive income, the unconsolidated statement of changes in equity and the unconsolidated statement of cash flows together with the notes thereon have been drawn up in conformity with the Insurance Ordinance, 2000, the Companies Act, 2017 (XXI of 2017), and are in agreement with the books of account;

- c) except for the matters described in the Basis for Qualified Opinion section of our report, investments made, expenditure incurred and guarantees extended during the year were for the purpose of the company's business; and;
- d) no zakat was deductible at source under the Zakat and Ushr Ordinance, 1980 (XVIII of 1980).

The engagement partner on the audit resulting in this independent auditor's report is Syed Naveed Abbas.

  
Chartered Accountants  
Karachi

Dated: 08 May 2025

UDIN: AR202310239jAo8qGNlv

**NATIONAL INSURANCE COMPANY LIMITED**  
**UNCONSOLIDATED STATEMENT OF FINANCIAL POSITION**  
**AS AT DECEMBER 31, 2023**

|  | Note | 2023<br>-----Rupees in '000----- | 2022               |
|--|------|----------------------------------|--------------------|
| <b>Assets</b>  |      |                                  |                    |
| Property and equipment   | 5    | 128,926                          | 87,584             |
| Intangible assets  | 6    | 6,400                            | (0)                |
| Investment property  | 7    | 3,106,398                        | 3,146,052          |
| Investments in subsidiary and associate                              | 8    | 358,560                          | 358,560            |
| Investments  |      |                                  |                    |
| Equity securities  | 9    | 6,842,554                        | 4,781,632          |
| Debt securities  | 10   | 53,674,738                       | 48,703,173         |
| Loans and other receivables  | 11   | 2,717,227                        | 3,027,918          |
| Insurance / Reinsurance receivables                                  | 12   | 12,025,560                       | 16,199,181         |
| Reinsurance recoveries against outstanding claims                    | 24   | 40,805,714                       | 35,247,541         |
| Deferred Commission Expense / Acquisition cost                       | 25   | 3,257                            | 8,730              |
| Salvage Recoveries Accrued   |      | 183,235                          | 374,385            |
| Taxation - payment less provisions                                   | 14   | 2,856,355                        | 2,998,857          |
| Prepayments  | 15   | 11,190,472                       | 9,348,781          |
| Cash & Bank  | 16   | 10,515,112                       | 4,988,170          |
| <b>Total Assets</b>  |      | <b>144,414,510</b>               | <b>129,270,565</b> |
| <b>Equity and Liabilities</b>  |      |                                  |                    |
| <b>Capital and reserves attributable to Company's equity holders</b> |      |                                  |                    |
| Ordinary share capital   | 17   | 2,000,000                        | 2,000,000          |
| Reserves   | 18   | 12,600,000                       | 12,600,000         |
| Fair Value Reserves  |      | 1,843,584                        | 967,374            |
| Unappropriated profit  |      | 43,107,830                       | 34,952,608         |
| <b>Total Equity</b>  |      | <b>59,551,414</b>                | <b>50,519,982</b>  |
| <b>Liabilities</b>   |      |                                  |                    |
| <b>Underwriting Provisions</b>                                       |      |                                  |                    |
| Outstanding claims including IBNR                                    | 24   | 47,490,353                       | 42,193,872         |
| Unearned premium reserves  | 23   | 15,516,759                       | 12,861,254         |
| Unearned Reinsurance Commission                                      | 25   | 371,729                          | 338,511            |
| Retirement benefit obligations                                       | 21   | 6,853,955                        | 6,327,403          |
| Premium received in advance  |      | 1,292,550                        | 1,540,822          |
| Insurance / Reinsurance Payables                                     | 19   | 9,143,088                        | 11,487,251         |
| Other Creditors and Accruals   | 20   | 4,194,662                        | 4,001,470          |
| <b>Total Liabilities</b>   |      | <b>84,863,095</b>                | <b>78,750,582</b>  |
| <b>Total Equity and Liabilities</b>                                  |      | <b>144,414,510</b>               | <b>129,270,565</b> |

Contingencies and commitments


22

The annexed notes 1 to 46 form an integral part of these financial statements.

  
Chief Executive Officer

  
Director

  
Director

  
Chairman

**NATIONAL INSURANCE COMPANY LIMITED**  
**UNCONSOLIDATED PROFIT AND LOSS ACCOUNT**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

|  | Note | 2023<br>-----Rupees in '000----- | 2022        |
|--|------|----------------------------------|-------------|
| Net insurance premium                                  | 23   | 5,712,885                        | 6,672,344   |
| Net Insurance claims                                   | 24   | (1,055,753)                      | (1,810,286) |
| Net Commission and other acquisition costs             | 25   | 778,018                          | 552,884     |
| Insurance claims and acquisition expenses              |      | (277,735)                        | (1,257,402) |
| Management Expenses                                    | 26   | (3,162,874)                      | (2,458,828) |
| Underwriting results                                   |      | 2,272,276                        | 2,956,113   |
| Investment income                                      | 27   | 9,847,698                        | 5,452,428   |
| Rental income  | 28   | 434,145                          | 353,429     |
| Other income   | 29   | 658,595                          | 1,454,504   |
| Other expenses   | 30   | (1,252,425)                      | (39,124)    |
| (Charge)/Reversal of impairment of investment property | 7.1  | -                                | -           |
| Results of operating activities                        |      | 9,688,013                        | 7,221,236   |
| Finance costs  | 31   | -                                | -           |
| Profit before tax                                      |      | 11,960,288                       | 10,177,350  |
| Income tax expense                                     | 32   | (3,836,868)                      | (2,704,969) |
| Profit after tax                                       |      | 8,123,420                        | 7,472,381   |
| Earnings (after tax) per share - basic and diluted     | 33   | 40.62                            | 37.36       |

The annexed notes 1 to 46 form an integral part of these financial statements.

  
Chief Executive Officer

  
Director

  
Director

  
Chairman

NATIONAL INSURANCE COMPANY LIMITED  
UNCONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME  
FOR THE YEAR ENDED DECEMBER 31, 2023

| Note  | 2023                     | 2022      |
|---|--------------------------|-----------|
|   | -----Rupees in '000----- |           |
| Profit after tax  | 8,123,420                | 7,472,381 |
| Other comprehensive income:   |                          |           |
| Items that may be subsequently reclassified to profit and loss account      | 876,210                  | (348,891) |
| Unrealized gain / (loss) on 'available-for-sale' investments                | 1,234,099                | (491,395) |
| Current tax   | (357,889)                | 142,505   |
| Items that will not be subsequently reclassified to profit and loss account |                          |           |
| Actuarial gain/(loss) on defined benefits plans                             | 44,791                   | (607,011) |
| Tax credit related to remeasurement loss on defined benefits plans          | (12,989)                 | 176,033   |
| Current tax   | 31,802                   | (430,978) |
| Total comprehensive income for the year                                     | 9,031,432                | 6,692,512 |

The annexed notes 1 to 46 form an integral part of these financial statements.

  
Chief Executive Officer

  
Director

  
Director

  
Chairman

NATIONAL INSURANCE COMPANY LIMITED  
UNCONSOLIDATED STATEMENT OF CHANGES IN EQUITY  
FOR THE YEAR ENDED DECEMBER 31, 2023


|                          | Share capital                                | Capital reserves               |  | Revenue reserves |                       |            |
|--------------------------|--|--------------------------------|--|------------------|-----------------------|------------|
| Note                     | Issued, Subscribed and paid-up share capital | Reserve for Exceptional Losses | Unrealised appreciation / (diminution) on revaluation of available-for-sale investments - net of tax | General reserves | Unappropriated Profit | Total      |
| -----Rupees in '000----- |  |                                |  |                  |                       |            |
|                          | 2,000,000                                    | 6,100,000                      | 1,316,265  | 6,500,000        | 27,911,205            | 43,827,470 |
|                          |  |                                | (348,891)  |                  | 7,472,381             | 7,472,381  |
|                          |  |                                |  |                  | (430,978)             | (779,869)  |
|                          | -  | -                              | (348,891)  | -                | 7,041,403             | 6,692,512  |
|                          |  |                                |  |                  | -                     | -          |
|                          | 2,000,000                                    | 6,100,000                      | 967,374  | 6,500,000        | 34,952,608            | 50,519,982 |
|                          |  |                                | 876,210  |                  | 8,123,420             | 8,123,420  |
|                          |  |                                |  |                  | 31,802                | 908,012    |
|                          | -  | -                              | 876,210  | -                | 8,155,222             | 9,031,432  |
|                          |  |                                |  |                  | -                     | -          |
|                          | 2,000,000                                    | 6,100,000                      | 1,843,584  | 6,500,000        | 43,107,830            | 59,551,414 |

The annexed notes 1 to 46 form an integral part of these financial statements.

  
Chief Executive Officer

  
Director

  
Director

  
Chairman

**NATIONAL INSURANCE COMPANY LIMITED**  
**UNCONSOLIDATED CASH FLOW STATEMENT**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

|  | 2023                     | 2022             |
|--|--------------------------|------------------|
|  | -----Rupees in '000----- |                  |
| <b>Operating Cash flows</b>                              |                          |                  |
| <b>Underwriting activities</b>                           |                          |                  |
| Insurance premium received                               | 33,666,650               | 20,120,794       |
| Reinsurance premium paid                                 | (24,999,706)             | (14,215,552)     |
| Claims paid  | (3,597,484)              | (2,362,247)      |
| Reinsurance and other recoveries received                | 2,636,712                | 1,527,494        |
| Commission received                                      | 1,015,197                | 501,881          |
| Management expenses paid                                 | (3,630,817)              | (3,515,991)      |
| Net cash flow from underwriting activities               | 5,090,553                | 2,056,379        |
| <b>Other operating activities</b>                        |                          |                  |
| Income tax paid  | (4,065,244)              | (2,957,277)      |
| Other operating receipts                                 | 1,046,809                | 1,143,880        |
| Loans advanced   | (16,248)                 | (12,798)         |
| Loan repayments received                                 | 160,569                  | 48,319           |
| Net cash flow from other operating activities            | (2,874,113)              | (1,777,876)      |
| <b>Total cash flow from all operating activities</b>     | <b>2,216,439</b>         | <b>278,503</b>   |
| <b>Investment activities</b>                             |                          |                  |
| Profit/ return received                                  | 506,466                  | 220,134          |
| Dividend received  | 418,060                  | 419,337          |
| Rental received  | 385,460                  | 302,369          |
| Payment for investments / investment properties          | (7,071,176)              | (6,193,542)      |
| Proceeds from investments / investment properties        | 9,097,942                | 5,357,299        |
| Fixed capital expenditure                                | (26,395)                 | (26,395)         |
| Proceeds from sale of property, plant and equipment      | 146                      | 1,162            |
| <b>Total cash flow from investing activities</b>         | <b>3,310,503</b>         | <b>80,364</b>    |
| <b>Financing activities</b>                              |                          |                  |
| Dividends paid   | -                        | -                |
| <b>Total cash flow from financing activities</b>         | <b>-</b>                 | <b>-</b>         |
| <b>Net cash flow from all activities</b>                 | <b>5,526,942</b>         | <b>358,867</b>   |
| Cash and cash equivalents at beginning of year           | 4,988,170                | 4,629,303        |
| <b>Cash and cash equivalents at end of year</b>          | <b>10,515,112</b>        | <b>4,988,170</b> |
| <b>Reconciliation to Profit and Loss Account</b>         |                          |                  |
| Operating cash flows                                     | 2,216,439                | 278,503          |
| Depreciation expense                                     | (65,008)                 | (55,361)         |
| Financial charges expense                                | -                        | -                |
| Loss on disposal of property, plant and equipment        | 146                      | 1,162            |
| Rental income  | 434,145                  | 353,429          |
| Dividend income  | 418,060                  | 419,337          |
| Other investment income                                  | 9,429,638                | 5,033,091        |
| Increase /(Decrease) in assets other than cash           | 9,617,003                | 39,924,305       |
| (increase)/Decrease in liabilities other than borrowings | (13,333,172)             | (39,897,466)     |
| Other income   | 658,595                  | 1,454,504        |
| Other expenses   | (1,252,425)              | (39,124)         |
| <b>Profit after taxation</b>                             | <b>8,123,420</b>         | <b>7,472,381</b> |

The annexed notes 1 to 46 form an integral part of these financial statements.



Chief Executive Officer



Director



Director



Chairman

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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**1. STATUS AND NATURE OF BUSINESS**

National Insurance Company Limited (the Company) was incorporated in Pakistan on March 31, 2000 as an unquoted public limited company under the Companies Act, 2017. The Company's registered office is situated in NIC Building, Abbasi Shaheed Road, Karachi, Sindh. The Company is principally engaged in non-life insurance business of public property, comprising fire, marine, aviation and transportation, engineering, etc.

With effect from January 01, 2001, the Company took over all the assets and liabilities of former National Insurance Corporation (NIC) at book values under the National Insurance Corporation (Re-organization) Ordinance, 2000. Accordingly, with effect from January 01, 2001, NIC has been dissolved and ceases to exist and the operations and undertakings of NIC are being carried out by the Company.

National Insurance Company Limited has a wholly-owned subsidiary Civic Centres Company (Private) Limited, which is incorporated in Pakistan.

**2. BASIS OF PREPARATION AND STATEMENT OF COMPLIANCE**

These unconsolidated financial statements have been prepared in accordance with approved accounting standards as applicable in Pakistan. Approved accounting standards comprise of such International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB) as are notified under the Companies Act, 2017, provisions of and directives issued under the Companies Act, 2017, the Insurance Ordinance, 2000 and Insurance Rules, 2017 and the Insurance accounting Regulations, 2017. In case requirements differ, the provisions or directives of the Companies Act, 2017, Insurance Ordinance, 2000 the Insurance Rules, 2017 and the Insurance accounting Regulations, 2017 shall prevail.

**2.1 BASIS OF MEASUREMENT**

These unconsolidated financial statements have been prepared under the historical cost convention except for 'held for trading' investments and 'available for sale' investments that are stated at fair value, 'held to maturity' investments that are stated at amortized cost and 'staff retirement benefits' that are carried at present value. The provision of IBNR and premium deficiency reserve is made on the basis of actuarial valuation.

**2.2 FUNCTIONAL AND PRESENTATION CURRENCY**

Items included in the unconsolidated financial statements are measured using the currency of the primary economic environment in which the Company operates. The financial statements are presented in Pakistani Rupees, which is the Company's functional and presentational currency.

**2.3 STANDARDS, INTERPRETATIONS AND AMENDMENTS TO THE PUBLISHED APPROVED ACCOUNTING STANDARDS**

**2.3.1 Standards, interpretations and amendments effective during the current year**

There are certain new and amended standards, interpretations and amendments that are mandatory for the Company's accounting periods beginning on or after 01 January 2023 but are considered not to be relevant or do not have any Significant effect on the Company's operations and therefore not detailed in these unconsolidated financial statements.

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

During the year, certain new standards and amendments to existing standards became effective. However, they did not have material effect on these unconsolidated financial statements.

**2.3.2 Standards, interpretations and amendments to approved accounting standards that are not yet effective**

The following standards, amendments and interpretations with respect to the approved accounting standards as applicable in Pakistan would be effective from the dates mentioned below against the respective standard or interpretation:

| Standard or Interpretation  | Effective date<br>(annual periods<br>beginning) |
|---|---|
| IAS 1 - 'Preparation of Financial Statements' - (Amendments)                | 01 January 2024                                 |
| IAS 7 - Statement of cash flows' (amendments)                               | 01 January 2024                                 |
| IAS 12 - 'Income taxes' (amendments)  | 01 January 2024                                 |
| IAS 21 - 'The effects of changes in foreign exchange rates'<br>(amendments) | 01 January 2025                                 |
| IFRS 7 - Financial instruments - disclosures' (amendments)                  | 01 January 2024                                 |
| IFRS 17 - 'Insurance Contract'  | 01 January 2026                                 |
| IFRS 9 - 'Financial Instruments'  | 01 January 2026*                                |

IFRS 17 - 'Insurance contracts' has been notified by the IASB to be effective for annual periods beginning on or after January 1, 2026 and has been notified by the Securities and Exchange of Pakistan vide S.R.O. 1715 (I)/2023 dated 21<sup>st</sup> November 2023.

\*The management has opted temporary exemption from the application of IFRS 9 as allowed by the International Accounting Standards Board (IASB) for entities whose activities are predominantly connected with insurance. Further details relating to temporary exemption from the application of IFRS 9 are given in notes 2.3.2.1 to these financial statements.

The management is in the process of assessing the impacts of these standards and amendments on the financial statements of the Company.

**2.3.2.1 Temporary exemption from application of IFRS 9**

As an insurance company, the management has opted temporary exemption from the application of IFRS 9 as allowed by the International Accounting Standards Board (IASB) for entities whose activities are predominantly connected with insurance as the percentage of the total carrying amount of its liabilities connected with insurance relative to the total carrying amount of all its liabilities is greater than 80 percent and the Company doesn't engage in significant activities unconnected with insurance based on historical available information.

Additional disclosures, as required by IASB, for being eligible to apply the temporary exemption from the application of IFRS 9 are given below.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**Fair value of financial assets as at December 31, 2023 and change in the fair values during the year ended December 31, 2023:**

|  | <b>As at 31<sup>st</sup> December 2023</b> |                       |                   |
|--|--|-----------------------|-------------------|
|  | <b>(Rupees in '000)</b>                    |                       |                   |
|  | <b>Cost</b>                                | <b>Carrying Value</b> | <b>Fair Value</b> |
| <b>Financial assets that meet the SPPI criteria</b>        |  |                       |                   |
| <i>Debt securities - Held to maturity (note 10)</i>        |  |                       |                   |
| Opening  | 46,621,800                                 | 48,703,173            | 48,299,976        |
| Additions during the Year                                  | 87,355,581                                 | 87,355,581            | 92,869,224        |
| Disposals during the year - net                            | (83,113,629)                               | (82,384,017)          | (88,196,663)      |
| Increase/Decrease in Value                                 | -  | -                     | -                 |
| <b>Closing</b>   | <b>50,863,753</b>                          | <b>53,674,738</b>     | <b>52,972,537</b> |
| <b>Financial assets that do not meet the SPPI criteria</b> |  |                       |                   |
| <i>Equity Securities - Available for sale (note 9)</i>     |  |                       |                   |
| Opening fair value   | 1,894,926                                  | 3,228,095             | 3,228,095         |
| Additions during the year - net                            | 30,947                                     | 30,947                | 46,787            |
| Impairment/Reversal of Impairment                          | -  | 17,392                | 17,392            |
| Increase/Decrease in Value                                 | -  | 1,234,099             | 1,187,312         |
| <b>Closing</b>   | <b>1,925,873</b>                           | <b>4,510,533</b>      | <b>4,479,586</b>  |

There are certain other new and amended standards, interpretations and amendments that are mandatory for the Company's accounting periods beginning on or after January 1, 2023 but are considered not to be relevant or will not have any significant effect on the Company's operations and are therefore not stated in these financial statements.

### **3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The significant accounting policies adopted in the preparation of these unconsolidated financial statements are set out below. These policies have been consistently applied to all the years presented unless stated otherwise.

#### **3.1 PROPERTY AND EQUIPMENT**

These are stated at cost less accumulated depreciation and accumulated impairment losses, if any. Depreciation is charged using the straight-line method in accordance with the rates specified in note 5 to these financial statements and after taking into account residual values, if significant.

Depreciation on additions is charged from the month the assets are available for use, while no depreciation is charged in the month of disposal.

Subsequent costs are included in the assets carrying amount or recognized as a separate asset, as appropriate, only when it is probable that the future economic benefits associated with the items will flow to the Company and the cost of the item can be measured reliably. Normal repairs and maintenance are charged to the profit and loss account as and when incurred.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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An item of property and equipment is derecognized upon disposal or when no future economic benefits are expected from its use. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the profit and loss account in the year the asset is derecognized. Depreciation methods, useful lives and residual values are reviewed, and adjusted if appropriate, at each reporting date.

**3.2 INTANGIBLE ASSETS**

An intangible asset is recognized as an asset if it is probable that future economic benefits attributable to the asset will flow to the entity and the cost of such asset can be measured reliably.

Costs directly associated with identifiable software that will have probable economic benefits exceeding costs beyond one year, are recognized as an intangible asset.

These are stated at cost less accumulated amortization and accumulated impairment losses, if any. Intangible assets are amortized on a straight-line basis over its estimated useful life as specified in note 6 to these financial statements after taking into account residual values, if significant. Amortization on additions is charged from the month in which the asset is put to use, whereas no amortization is charged in the month the asset is disposed of. The useful lives and amortization method are reviewed and adjusted, if appropriate, at each reporting date.

Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the profit or loss account when the asset is derecognized.

**3.3 INVESTMENT PROPERTY**

Investment properties are accounted for under the cost model in accordance with the requirements of International Accounting Standard (IAS) 40, "Investment Property".

- Leasehold land is stated at cost.
- Buildings on leasehold land are depreciated to their estimated salvage value on a straight-line basis over their useful lives.
- Lifts, HVAC and other installations forming part of buildings on leasehold land but having separate useful lives are depreciated under the straight-line method.

Depreciation charge, subsequent capital expenditure on existing properties, normal repair & maintenance and gains or losses on disposals are accounted for in similar manner as those applicable to property and equipment (note 3.1).

**3.4 INSURANCE CONTRACTS**

Insurance contracts are those contracts under which the Company as insurer has accepted insurance risk from the insurance contract holder (insured) by agreeing to compensate the insured if a specified uncertain future event (the insured event) adversely affects the insured. Once a contract has been classified as an insurance contract, it remains an insurance contract for the remainder of its tenure, even if the insurance risk changes significantly during this period, unless all rights and obligations are extinguished or expired. Insurance contracts are classified into the following main categories, depending on the nature and duration of risk and whether or not the terms and conditions are fixed:

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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- **Fire and property**

Fire and property insurance contracts mainly compensate the Company's customers for damage suffered to their properties or for the value of property lost. Customers who undertake commercial activities on their premises could also receive compensation for the loss of earnings caused by the inability to use the insured properties in their business activities. These contracts are generally one-year contracts.

- **Marine cargo**

Marine cargo insurance protects all goods while in transit depending upon the needs of a client.

- **Marine hull**

Marine hull insurance provides cover for ship of all kinds, barges, tugs, dredgers, fishing trawlers, yacht, pleasure boats, speed boats etc.

- **Aviation**

Aviation covers the aircraft itself for accidental damage or loss from whatsoever cause operating anywhere in the world subject to certain terms and conditions, and damage to/loss of spare parts of the aircraft/engines against all risks.

- **Motor**

Motor insurance provides protection against losses incurred as a result of theft, traffic accidents and against third party liability that could be incurred in an accident. These contracts are generally one year contracts.

- **Engineering**

Engineering insurance offers comprehensive and adequate protection against loss or damage in respect of the contract works, construction plant and equipment and/or construction machinery, as well as against third party claims in respect of property damage and/or bodily injury arising in connection with the execution of construction project. These contracts are normally one year insurance contracts except some engineering insurance contracts that are of more than one year period.

- **Miscellaneous**

All other types of insurance contracts are classified in miscellaneous category which includes mainly terrorism, personal accident, worker compensation, Cash-in-Safe, Cash-in-Transit insurance etc. These contracts are normally one year insurance contracts.

The Company enters into outward reinsurance arrangements only in the normal course of business in order to limit the potential for losses arising from certain exposures and does also engage in inward reinsurance arrangements.

The Company neither issues investment contracts nor does it issue insurance contracts with discretionary participation features (DPF).

### **3.5 UNEARNED PREMIUM RESERVE**

Provision for unearned premium is calculated by applying 365 days method, except marine cargo insurance for which unearned premium is calculated by applying twenty fourths' method.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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**3.6 PREMIUM DEFICIENCY RESERVE**

The Company is required under Insurance Rules, 2017 to maintain a provision in respect of premium deficiency for the individual class of business where the unearned premium liability is not adequate to meet the expected future liability, after reinsurance, from claims and other supplementary expenses expected to be incurred after the Statement of Financial position date in respect of the unexpired policies in that class of business at the Statement of Financial position date. The movement in the premium deficiency reserve (PDR) is recognized in the profit and loss account for the year.

The requirement for additional provision for unexpired risks is determined on the basis of an actuarial valuation. The latest valuation was carried out as of December 31, 2023. Premium deficiency reserve analysis, a rough estimate of management expenses is used. The management expenses for each line of business are obtained by splitting this amount on the basis of gross premium. Gross premium of each line of business is divided by the total gross premium and this ratio is multiplied with the total management expenses to obtain estimated value of management expenses for each line of business.

**3.7 REINSURANCE CONTRACTS HELD**

These are contracts entered into by the Company with reinsurers for compensation of losses suffered on insurance contracts issued. These reinsurance contracts include both facultative and treaty arrangement contracts and are classified in same categories of insurance contracts for the purpose of these financial statements. The Company recognizes the entitled benefits under the contracts as various reinsurance assets and liabilities. Reinsurance assets and liabilities are derecognized when contractual rights are extinguished or expired.

The deferred portion of reinsurance premium is recognized as a prepayment. The deferred portion of reinsurance premium ceded is calculated by using twenty fourths' method.

**3.8 RECEIVABLES AND PAYABLES RELATED TO INSURANCE CONTRACTS**

**3.8.1 Due to/ from insurance contract holders**

These are initially recognized at cost which is the fair value of consideration received. Provision for impairment on premium receivable is established when there is objective evidence that the Company will not be able to collect all amounts due according to original terms of receivables. Receivables are also analyzed as per their aging and accordingly provision is maintained on a systematic basis.

**3.8.2 Due to / from reinsurer**

Amounts due to / from re-insurer are carried at cost less provision for impairment. Cost represents the fair value of the consideration to be received / paid in the future for services rendered / received. Provision for impairment on amount due from reinsurer is established when there is objective evidence that the Company will not be able to collect all amounts due according to original terms.

The Company has reinsurance arrangements with Pakistan Reinsurance Company Limited (PRCL) only.

**3.9 SEGMENT REPORTING**

An operating segment is a component of the Company that engages in business activities from which it may earn revenues and incur expenses including revenues and expenses that relate to

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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transactions with any of the Company's other components. All operating segments' results are reviewed regularly by the Company to make decisions about resources to be allocated to the segment and assess its performance, and for which discrete financial information is available.

The Company presents segments reporting of operating results using the classes of business as specified under the Insurance Accounting Regulations, 2017. The reported operating segments are also consistent with the internal reporting process of the Company for allocating resources and assessing performance of the operating segments. The performance of segments is evaluated on the basis of underwriting results of each segment.

Based on its classification of insurance contracts issued, the Company has five primary business segments for reporting purposes namely fire and property, marine aviation and transport, motor, engineering and miscellaneous. The nature and business activities of these segments are disclosed in note 3.4.

Assets and liabilities are allocated to particular segments on actual basis. Those assets and liabilities which cannot be allocated to a particular segment on a reasonable basis are reported as unallocated corporate assets and liabilities. Further, the management expenses were allocated to each segment on the basis disclosed in note 3.24.

**3.10 CASH AND CASH EQUIVALENTS**

Cash and cash equivalent comprises of cash in hand, policy stamps, cheques in hand, bank balances and other deposits which are readily convertible to cash and which are used in the cash management function on a day-to-day basis.

**3.11 REVENUE RECOGNITION**

**3.11.1 Premium**

For all the insurance contracts, premiums are recognized as written from the date of issuance of policy (i.e. attachment of the risk to the policy). Where premiums for a policy are payable in instalments, full premium for the duration of the policy is recognized as written at the inception of the policy and related assets set up for premiums receivable at a later date. Premiums are stated exclusive of taxes and duties levied on premiums.

Revenue from premium is determined after taking into account the unearned portion of premium. The unearned portion of premium income is recognized as a liability.

Reinsurance premium is recognized as an expense after taking into account the proportion of deferred premium expense which is calculated using twenty fourths' method. The deferred portion of premium expense is recognized as a prepayment.

**3.11.2 Commission Income**

Commission and other forms of revenue (apart from recoveries) from reinsurers are deferred and recognized as liability and recognized in the profit and loss account as revenue in accordance with the pattern of recognition of the reinsurance premiums.

**3.11.3 Investment Income**

- Unrealized appreciation or diminution on revaluation of investments classified as available-for-sale is included in the statement of comprehensive income in the period to which it relates.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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- Gain or loss on remeasurement of investments held-for-trading is recognized in profit and loss account.
- Profit on held-to-maturity instruments is recognized on a time proportion basis taking into account the effective yield on the investments.
- Gain or loss on sale of investments is recognized in the profit and loss at the time of sale.
- Dividend income is recognized when the right to receive the same is established.
- Return on bank and other saving deposits is recognized on time proportion basis.

**3.11.4 Income from investment properties**

Rental income on investment properties is recognized on a time proportion basis.

**3.12 INVESTMENTS**

All investments are initially recognized at cost, being the fair value of the consideration given and include transaction costs except for those classified as held for trading. Subsequently, these are recognized and classified as follows:

- At fair value through profit or loss
- Held to maturity
- Available-for-sale

The classification depends on the purpose for which the financial assets were acquired

**3.12.1 Held for trading**

Quoted investments which are acquired principally for the purpose of generating profit from short-term fluctuations in price or are comprised in a portfolio of which there is a recent actual pattern of short-term profit taking are classified as held for trading.

Subsequent to initial recognition these are re-measured at fair value by reference to quoted market prices with the resulting gain or loss being included in profit or loss for the period in which it arises.

**3.12.2 Held to maturity**

Investments with fixed maturity, where management has both the intent and ability to hold to maturity, are classified as held to maturity.

Subsequently, these are measured at amortized cost. Any premium paid or discount availed on acquisition of held to maturity investment is deferred and amortized over the term of the investment using the effective yield method.

These are reviewed for impairment at year end and any losses arising from impairment in value are charged to the profit and loss account.

**3.12.3 Available for sale**

Investments which are intended to be held for undefined period of time but may be sold in response to the need for liquidity, changes in interest rates, equity prices or exchange rates are classified as available for sale.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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**Quoted**

Subsequent to initial recognition, these investments are remeasured at fair value. Gains or losses on remeasurement of these investments are recognized in the statement of comprehensive income.

**Unquoted**

Unquoted investments are recognized at fair value of the consideration paid less accumulated impairment losses, if any.

**3.12.4 Investment in subsidiary company**

Investment in subsidiary company is stated at cost.

**3.12.5 Fair value measurements**

The fair value of investments held for trading is their quoted bid price at the Statement of Financial position date.

**3.12.6 Recognition/derecognition of Investments**

Investments held for trading and available for sale investment are recognized / derecognized by the Company on the day it commits to purchase / sell the investment. Investments held-to-maturity are recognized / derecognized on the day they are transferred to / sold by the Company.

Regular way purchases and sales of investments that require delivery within the time frame established by regulations or market convention are recognized at the trade date. Trade date is the date on which the Company commits to purchase or sell the investment.

**3.13 OFFSETTING OF FINANCIAL ASSETS AND LIABILITIES**

Financial assets and liabilities are off set and the net amount is reported in these unconsolidated financial statements only when there is a legally enforceable right to set-off the recognized amount and the Company intends either to settle on a net basis, or to realize the assets and to settle the liabilities simultaneously.

**3.14 UNDERWRITING PROVISIONS**

Underwriting provision consist of provision for outstanding claims including claims payable and provision for losses Incurred but Not Reported (IBNR) and provision for deferment of premium (unearned premium) and commission income (unearned commission income). These provisions are determined and recorded based on the percentages suggested by the actuarial valuation report. The actuarial valuation is carried out annually. The methods used for determination of these reserves are stated in note 38 "valuation of insurance reserves".

**3.14.1 Provision for outstanding claims (including IBNR)**

Provisions for outstanding claims include amounts in relation to unpaid reported claims, claims incurred but not reported (IBNR) and expected claims settlement costs.

**Outstanding Claims**

This represents the amount of claims that have been reported and are yet unpaid or partially unpaid at the end of reporting year for a given accident year.

A liability for outstanding claims (claim incurred) is recognized for all claims incurred which represents the estimates of the claims intimated or assessed before the end of the reporting

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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period and measured at the undiscounted value of expected future payments. Provision for liability in respect of unpaid reported claims is made on the basis of individual case estimates while taking into consideration the past claims settlement experience including handling costs and the Company's reserving policy. Where applicable, deductions are made for salvage and their recoveries.

Reinsurance recoveries against outstanding claims and salvage recoveries are recognized as an asset and measured at the amount expected to be received.

Liability for outstanding claims has adjusted for the effects of subsequent development in the provision for outstanding claims in subsequent year. As per IAS 37 and IAS 10, it is required that 'subsequent payment / settlement of claims before any date when the unconsolidated financial statements are authorized for issue' is an 'adjusting event' and the claim expense and reinsurance recovery shall be accounted for at 'actual / settlement amount' in the year in which the loss event occurred.

**Incurred But Not Reported (IBNR Claims)**

This represents losses that have incurred or are in the occurrence period at the end of the reporting year and have not been intimated to the Company by the end of the reporting year.

The Company is required, as per the SECP circular no. 9 of 2016 dated March 9, 2016 "Guidelines for Estimation of Incurred But Not Reported (IBNR) Claims Reserve, 2016" to estimate and maintain the provision for claims incurred but not reported for each class of business by using the prescribed method which is "Chain Ladder Method" or any other alternate method as allowed under the provisions of the Guidelines.

The actuarial valuation as at December 31, 2023 has been carried out by an independent firm of actuaries for determination of IBNR for each class of business.

**3.15 TAXATION**

Income tax expense comprises current and deferred tax. Income tax expense is recognized in the profit and loss account, except to the extent that it relates to items recognized directly in equity or in the statement of comprehensive income, in which case it is recognized in equity or in the statement of comprehensive income respectively.

**3.15.1 Current taxation**

Provision for the current taxation is based on taxable income at current rates of taxation after taking into account tax credits and rebates available, if any. The charge for the current taxation also includes adjustments that were considered necessary, relating to prior years which arise from assessments framed / finalized during the year or required by any other reason.

**3.15.2 Deferred taxation**

Deferred taxation is recognized using the Statement of Financial position liability method for all temporary differences between the amounts attributed to assets and liabilities for financial reporting purposes and the amount used for taxation purposes. The amount of deferred tax is recognized based on the expected manner of realization on settlement of the carrying amount of assets and liabilities using tax rates enacted at the Statement of Financial position date.

A deferred tax asset is recognized only to the extent that it is probable that future taxable profits will be available against which the asset can be utilized. Deferred tax assets are reduced to the extent that it is no longer probable that the related tax benefit will be realized.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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**3.16 STAFF RETIREMENT BENEFITS**

**3.16.1 Defined contribution plan - Provident fund**

The Company operates a non-contributory provident fund scheme for those eligible employees who have opted the scheme. Contribution to the fund is made by the employees @ 10% of their basic pay. However, the Company does not contribute to the fund.

**3.16.2 Defined benefit plans**

The Company operates the following defined benefit plans / scheme for its employees:

- Fund pension scheme.
- Unfunded gratuity scheme (for employees under Monetized Salary Package Scheme).
- Unfunded post-retirement medical benefit scheme.
- Unfunded compensated absences.

The employees who have joined the Company on or after January 01, 2001 under Monetized Salary Package Scheme (MSP) are eligible for unfunded gratuity scheme.

The Company accounts for all accumulated compensated absences when the employees render service that increases their entitlement to future compensated absences based on actuarial valuation. The actuarial valuation has been carried out using the projected unit credit method. Actuarial valuation is carried out annually as on December 31.

The Company's obligation under the above schemes is determined by estimating the amount of future benefits that the employees have earned in return of their services in the current and prior years, that benefit is discounted to determine the present value and the fair value of plan assets, if any, is deducted. The calculation is performed by an independent actuary.

All actuarial gains and losses are immediately recognized in the period in which they occur through the statement of comprehensive income.

Assumptions and other findings of post-employment benefits have been briefly disclosed in note 21.

**3.17 IMPAIRMENT OF ASSETS**

**3.17.1 Financial assets**

A financial asset is assessed at each reporting date to determine whether there is any objective evidence that it is impaired. A financial asset is considered to be impaired if objective evidence indicates that one or more events have had a negative effect on the estimated future cash flows of that asset. An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined if no impairment loss had been recognized.

**3.17.2 Non-financial assets**

The carrying amounts of non-financial assets are assessed at each reporting date to ascertain whether there is any indication of impairment. If any such indication exists then the asset's recoverable amount is estimated. An impairment loss is recognized, as an expense in the profit and loss account, for the amount by which the asset's carrying amount exceeds its recoverable

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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amount. The recoverable amount is the higher of an asset's fair value less cost to sell and value in use. Value in use is ascertained through discounting of the estimated future cash flows using a discount rate that reflects current market assessments of the time value of money and the risk specific to the assets. For the purpose of assessing impairment, assets are grouped at the lowest levels at which they are generating separately identifiable cash flows (cash generating units).

**3.18 LOANS AND OTHER RECEIVABLES**

Loans and other receivables are stated initially at fair value and subsequently measured at amortised cost using the effective interest rate method. Other receivables comprise of rent, balance due from pension fund and interest receivable from PIBs. A provision for impairment of loans, advances and other receivables is established where there is objective evidence that the Company will not be able to collect all amounts due according to the original terms of the receivables. The amount of provision is charged to the profit and loss account. Loans, advances and other receivables are written off when considered irrecoverable.

**3.19 PREMIUM RECEIVED IN ADVANCE**

Premium received in advance is carried at cost which is the fair value of consideration received against services to be provided in the future.

**3.20 CREDITORS AND ACCRUALS**

**3.20.1 Accrued expenses**

Accrued expenses are carried at cost which is the fair value of the consideration to be paid in the future for the goods and / or services received, whether or not billed to the Company.

**3.20.2 Other liabilities**

Other liabilities are carried at cost which is the fair value of the consideration to be paid / received in the future for the goods and / or services received / provided, whether or not billed to / by the Company. Except for liability for government levies including Excise Duty, Sales Tax on Services, Federal Insurance Fee and Stamp Duty, as applicable on underwriting activities have been recognized after receipt of such amount from respective clients.

**3.21 FOREIGN CURRENCY TRANSACTIONS**

Foreign currency transactions are translated into Pakistani Rupees at exchange rates prevailing on the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are translated into Pakistani Rupees at the rates of exchange prevailing at the Statement of Financial position date. Exchange differences, if any, are taken to profit and loss account.

**3.22 FINANCIAL INSTRUMENTS**

All the financial assets and liabilities are recognized at the time when the Company becomes a party to the contractual provisions of instrument. Any gains or losses on de-recognition of financial assets and liabilities are taken to profit and loss account currently.

**3.23 DIVIDEND AND APPROPRIATION TO RESERVES**

Dividend and appropriation to reserves are recognized as liability in the Company's unconsolidated financial statements in the year in which these are approved.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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**3.24 ALLOCATION OF EXPENSES TO UNDERWRITING BUSINESS**

Expenses of management allocated to the underwriting business represent directly attributable expenses and indirect expenses allocated on the basis of gross premium income under individual business.

**3.25 EARNINGS PER SHARE**

The Company presents basic and diluted earnings per share (EPS) for its shareholders.

**3.25.1 Basic EPS**

Basic EPS is calculated by dividing the profit or loss attributable to ordinary shareholders of the Company by the weighted average number of ordinary shares outstanding during the year.

**3.25.2 Diluted EPS**

Diluted EPS is determined by adjusting the profit or loss attributable to ordinary shareholders and the weighted average number of ordinary shares outstanding for the effects of all dilutive potential ordinary shares, if any.

**3.26 PROVISIONS, CONTINGENT ASSETS AND CONTINGENT LIABILITIES**

Provisions are recognized in the Statement of Financial position when the Company has a legal or constructive obligation, as a result of past events, and it is probable that an outflow of resources will be required to settle the obligation, and a reliable estimate can be made of the amount of obligation.

Provisions for product warranties, legal disputes, onerous contracts or other claims are recognized when the Company has a present legal or constructive obligation as a result of a past event, it is probable that an outflow of economic resources will be required from the Company and amounts can be estimated reliably. Timing or amount of the outflow may still be uncertain.

Provisions are measured at the estimated expenditure required to settle the present obligation, based on the most reliable evidence available at the reporting date, including the risks and uncertainties associated with the present obligation. Where there are a number of similar obligations, the likelihood that an outflow will be required in settlement is determined by considering the class of obligations as a whole. Provisions are discounted to their present values, where the time value of money is material.

Any reimbursement that the Company can be virtually certain to collect from a third party with respect to the obligation is recognized as a separate asset. However, this asset may not exceed the amount of the related provision.

No liability is recognized if an outflow of economic resources as a result of present obligations is not probable. Such situations are disclosed as contingent liabilities unless the outflow of resources is remote.

**3.27 LEASE LIABILITY AND RIGHT-OF-USE ASSET**

The Company leases certain branches. Rental contracts are typically for a period of 3 years and may have extension options as described below. At inception of a contract, the Company assesses whether a contract is, or contains, a lease based on whether the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. Lease term are negotiated on an individual basis and contain different terms and conditions.

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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In determining the lease term, management considers all facts and circumstances that create an economic incentive to exercise an extension option or not exercise a termination options. Extension options (or periods after termination options) are only included in the lease term if the lease is reasonably certain to be extended (or not terminated). The lease liability is initially measured at the present value of the lease payments over the period of lease term and that are not paid at the commencement date, discounted using the interest rate implicit in the lease, or if that rate cannot be readily determined, the Company's incremental borrowing rate.

Lease payments include fixed payments less any lease incentive receivable, variable lease payments that are based on an index or a rate which are initially measured using the index or rate as at the commencement date, amounts expected to be payable by the Company under residual value guarantees, the exercise price of a purchase option if the Company is reasonably certain to exercise that option and payments of penalties for terminating the lease if the lease term reflects the lessee exercising that option. The extension and termination options are incorporated in determination of lease term only when the Company is reasonably certain to exercise these options.

The lease liability is subsequently measured at amortized cost using the effective interest rate method. The lease liability is also remeasured to reflect any reassessment or lease modification, or to reflect revised in-substance fixed lease payment. The lease liability is remeasured when the Company reassesses the reasonable certainty of exercising the extension or termination option upon occurrence of either a significant event or a significant change in circumstances, or when there is a change in assessment of an option to purchase underlying asset, or when there is a change in amount expected to be payable under a residual value guarantee, or when there is a change in future lease payments resulting from a change in an index or rate used to determine those payments. The corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded in the profit and loss account if the carrying amount of right-of-use asset has been reduced to zero.

When there is a change in scope of a lease, or the consideration for a lease, that was not part of the original terms and conditions of the lease, it is accounted for as a lease modification. The lease modification is accounted for as a separate lease if modification increases the scope of lease by adding the right-to-use one or more underlying assets and the consideration for lease increases by an amount that is commensurate with the stand-alone price for the increase in scope adjusted to reflect the circumstances of the particular contracts, if any. When the lease modification is not accounted for as a separate lease, the lease liability is remeasured and corresponding adjustment is made to right-of-use asset.

The right-of-use asset is initially measured at an amount equal to the initial measurement of lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of the costs to be incurred to dismantle and remove the underlying asset or to restore the underlying asset or the site on which the asset is located.

The right-of-use asset is subsequently measured at cost model. The right-of-use asset is depreciated on a straight-line method over the lease term as this method most closely reflects the expected pattern of consumption of future economic benefits. The right-of-use asset is reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

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The Company has elected to apply the practical expedient of not to recognize right-of-use asset and lease liabilities for short term leases that have a lease term of 12 months or less and leases of low-value assets. The lease payments associated with these leases is recognized as an expense on a straight-line basis over the lease term.

**3.28 RESERVE FOR EXCEPTIONAL LOSSES**

The reserve for exceptional losses was set aside prior to 1979 and was charged to income with the provision of Income Tax Act of 1922 (repealed). The Company has ceased to set aside such reserves.

**4. CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS**

The preparation of these unconsolidated financial statements in conformity with approved accounting standards as applicable in Pakistan requires management to make judgments, estimates and assumptions that affect the application of policies and reported amounts of assets and liabilities, income and expenses. The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances, the result of which form the basis of making the judgments about carrying values of assets and liabilities that are not readily apparent from other sources.

Actual results may differ from these estimates. The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods.

Significant areas where assumptions and estimates were exercised in application of accounting policies relate to the following:

|  | <u>Notes</u> |
|--|--------------|
| • Property and equipment                               | 3.1          |
| • Investment Property                                  | 3.3          |
| • Premium deficiency reserve (liability adequacy test) | 3.6          |
| • Receivables related to insurance contracts           | 3.8          |
| • Provision for outstanding claims (including IBNR)    | 3.14         |
| • Taxation   | 3.15         |
| • Employee Retirement Benefits                         | 3.16         |
| • Impairment of Assets                                 | 3.17         |
| • Provisions, Contingencies and Commitments            | 3.26         |

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22

5.1.1 As the itemized details of fixed assets acquired on or before December 31, 2017, are not available, therefore, the provision of impairment has been booked against the remaining carrying value of these fixed assets amounting Rs. 71,324,500. The Company has successfully developed the fixed asset register which includes detailed and accurate records of all fixed assets purchased from the year 2018 & onwards.

5.1.2 Disposal of property and equipment

|                               |                           | 2023                          |            |                |               |                       |
|-------------------------------|---------------------------|-------------------------------|------------|----------------|---------------|-----------------------|
| Particulars                   | Particulars of Buyer      | Relationship with the company | Cost       | Net book value | Sale Proceeds | Gain/Loss on Disposal |
|                               |                           |                               | Rs in '000 |                |               |                       |
| Vehicles                      |                           |                               |            |                |               |                       |
|                               | Mention names of employee |                               |            |                |               |                       |
| Suzuki Cultus 2010 (IDM-527)  | Miss. Aiesha Farooq       | Employee                      | 610        |                |               | -                     |
| Toyota Corolla 2009 (GP-5848) | Mr. Farukh Majeed Qureshi | Employee                      | 1,394      | 7              | 7             |                       |
| Honda City 2019 (BQN-306)     | Shahkh Abdul Qayyum       | Employee                      | 2,377      | 64             | 64            |                       |
| Honda City 2019 (BQN-316)     | Mr. Muhammad Ali          | Employee                      | 2,377      | 985            | 985           |                       |
| Suzuki Cultus 2019 (BQN-308)  | Mr Naveed Ahmad           | Employee                      | 1,455      | 985            | 985           |                       |
|                               |                           |                               |            | 570            | 570           |                       |
| 2023                          |                           |                               | 8,213      | 2,612          | 2,612         | -                     |
| 2022                          |                           |                               | 3,416      | 772            | 772           |                       |

6 INTANGIBLE ASSETS

|                        | Cost            |           |                          |                   | Amortization    |                     |                          |                   | Written down value as at 31 December | Amortization Rate |
|------------------------|-----------------|-----------|--------------------------|-------------------|-----------------|---------------------|--------------------------|-------------------|--------------------------------------|-------------------|
|                        | As at 1 January | Additions | (Disposals)/ Adjustments | As at 31 December | As at 1 January | Charge For the year | (Disposals)/ Adjustments | As at 31 December |                                      |                   |
|                        | Rs in '000      |           |                          |                   |                 |                     |                          |                   |                                      |                   |
| Computer software-2023 | 3,325           | 8,000     | -                        | 11,325            | 3,325           | 1,600               | -                        | 4,925             | 6,400                                | 30%               |
| Computer software-2022 | 3,325           | -         | -                        | 3,325             | 3,325           | -                   | -                        | 3,325             | (0)                                  | 30%               |

Disclose the classification of intangible as either finite or infinite life and basis of amortization for each intangible asset.

Disclose description, the carrying amount and remaining amortization period of any individual intangible asset that is material to the financial statements as a whole; the existence and carrying amounts of intangible assets whose title is restricted and the carrying amounts of intangible assets pledged as security for liabilities; a description of any fully amortized intangible asset that is still in use; and a brief description of significant intangible assets controlled by the enterprise but not recognized as assets because they did not meet the recognition criteria.

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7 INVESTMENT PROPERTY

7.1 Carrying amount - (net of depreciation)

|                            |       | 2023                 |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
|----------------------------|-------|----------------------|-------------------------|------------------------|----------------------|--------------------------|------------------------|----------------------|-------------------------------------|------------------------|-------------|---|
|                            |       | Cost                 |                         |                        | Depreciation         |                          |                        | Impairment           |                                     |                        | Useful Life |   |
|                            |       | As at 1 January 2023 | Additions / (Disposals) | As at 31 December 2023 | As at 1 January 2023 | For the year/(Disposals) | As at 31 December 2023 | As at 1 January 2023 | For the year/(Disposals)/(Reversal) | As at 31 December 2023 |             | Written down value as at 31 December 2023 |
| Note                       |       | Rupees in '000       |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
|                            |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| Leasehold Land             |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Karachi                  |       | 7,904                | -                       | 7,904                  | -                    | -                        | -                      | -                    | -                                   | -                      | 7,904       |   |
| - Islamabad                |       | 46,193               | -                       | 46,193                 | -                    | -                        | -                      | -                    | -                                   | -                      | 46,193      |   |
| - Dohi Karachi             | 7.2.1 | 491,001              | -                       | 491,001                | -                    | -                        | -                      | -                    | -                                   | -                      | 491,001     |   |
| - Lahore                   | 7.2.2 | 1,170,210            | -                       | 1,170,210              | -                    | -                        | -                      | -                    | -                                   | -                      | 1,170,210   |   |
| Freehold Land              |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Lahore Land              |       | 389,523              | -                       | 389,523                | -                    | -                        | -                      | -                    | -                                   | -                      | 389,523     |   |
|                            |       | 2,104,831            | -                       | 2,104,831              | -                    | -                        | -                      | -                    | -                                   | -                      | 2,104,831   |   |
| Building on Leasehold Land |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Karachi                  |       | 396,056              | -                       | 396,056                | 344,451              | 7,205                    | 351,656                | -                    | -                                   | -                      | 44,400      |   |
| - Islamabad                |       | 334,007              | -                       | 334,007                | 270,551              | 3,363                    | 273,914                | -                    | -                                   | -                      | 60,093      |   |
| - Dubai                    | 7.2.3 | 1,698,938            | -                       | 1,698,938              | 773,248              | 29,069                   | 802,317                | -                    | -                                   | -                      | 896,621     |   |
| Building on Freehold Land  |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Lahore                   |       | 1,467                | -                       | 1,467                  | 997                  | 16                       | 1,013                  | -                    | -                                   | -                      | 454         |   |
| Buildings                  |       | 2,430,468            | -                       | 2,430,468              | 1,389,247            | 39,654                   | 1,428,901              | -                    | -                                   | -                      | 1,001,567   |   |
|                            |       | 4,535,299            | -                       | 4,535,299              | 1,389,247            | 39,654                   | 1,428,901              | -                    | -                                   | -                      | 3,106,398   |   |

|                            |       | 2022                 |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
|----------------------------|-------|----------------------|-------------------------|------------------------|----------------------|--------------------------|------------------------|----------------------|-------------------------------------|------------------------|-------------|---|
|                            |       | Cost                 |                         |                        | Depreciation         |                          |                        | Impairment           |                                     |                        | Useful Life |   |
|                            |       | As at 1 January 2022 | Additions / (Disposals) | As at 31 December 2022 | As at 1 January 2022 | For the year/(Disposals) | As at 31 December 2022 | As at 1 January 2022 | For the year/(Disposals)/(Reversal) | As at 31 December 2022 |             | Written down value as at 31 December 2022 |
| Note                       |       | Rupees in '000       |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| Leasehold Land             |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Karachi                  |       | 7,904                | -                       | 7,904                  | -                    | -                        | -                      | -                    | -                                   | -                      | 7,904       |   |
| - Islamabad                |       | 46,193               | -                       | 46,193                 | -                    | -                        | -                      | -                    | -                                   | -                      | 46,193      |   |
| - Dehi Karachi             | 7.2.1 | 491,001              | -                       | 491,001                | -                    | -                        | -                      | -                    | -                                   | -                      | 491,001     |   |
| - Lahore                   | 7.2.2 | 1,170,210            | -                       | 1,170,210              | -                    | -                        | -                      | -                    | -                                   | -                      | 1,170,210   |   |
| Freehold Land              |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Lahore Land              |       | 389,523              | -                       | 389,523                | -                    | -                        | -                      | -                    | -                                   | -                      | 389,523     |   |
|                            |       | 2,104,831            | -                       | 2,104,831              | -                    | -                        | -                      | -                    | -                                   | -                      | 2,104,831   |   |
| Building on Leasehold Land |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Karachi                  |       | 396,056              | -                       | 396,056                | 337,245              | 7,205                    | 344,451                | -                    | -                                   | -                      | 51,605      | 40 Years                                  |
| - Islamabad                |       | 334,007              | -                       | 334,007                | 267,188              | 3,363                    | 270,551                | -                    | -                                   | -                      | 63,456      | 2.5 to 6.7                                |
| - Dubai                    | 7.2.3 | 1,698,938            | -                       | 1,698,938              | 744,179              | 29,069                   | 773,248                | -                    | -                                   | -                      | 925,690     | 2.5 to 6.7                                |
| Building on Freehold Land  |       |                      |                         |                        |                      |                          |                        |                      |                                     |                        |             |   |
| - Lahore                   |       | 1,467                | -                       | 1,467                  | 981                  | 16                       | 997                    | -                    | -                                   | -                      | 470         | 2.5                                       |
| Buildings                  |       | 2,430,468            | -                       | 2,430,468              | 1,349,593            | 39,653                   | 1,389,247              | -                    | -                                   | -                      | 1,641,321   | 40 Years                                  |
|                            |       | 4,535,299            | -                       | 4,535,299              | 1,349,593            | 39,653                   | 1,389,247              | -                    | -                                   | -                      | 3,146,052   |   |

7.1.1 Building including related leasehold lands are held by the Company for both own use purpose and as investment properties. The carrying value of these buildings and leasehold lands have been allocated between the investment properties and asset held for own use on the basis of floor space occupied for respective purposes. Investment properties are let out to related and other parties under operating lease arrangement. The related to whom investment properties are let out include SECP and NESPAK.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

7.1.2 The market value of the investment properties as per valuation carried out by professional valuers in 2023 is Rs. 22,909 million.

7.1.3 Valuation of land and building is required to be carried out on an annual basis under the Insurance Rules, 2017. Following is the result of such valuation (together with the name of the valuers) and attribution of land and building into investment property and fixed asset:

|                           | 2023                                 | 2022                                 | 2023                                 |                   | 2022   |                   | 2023                                     |                  | 2022           |  |
|---------------------------|--------------------------------------|--------------------------------------|--------------------------------------|-------------------|--|-------------------|--|------------------|----------------|--|
|                           |                                      |                                      | Rupees in '000                       |                   | Rupees in '000                                   |                   | Rupees in '000                           |                  | Rupees in '000 |  |
|                           |                                      |                                      | Total market value as per the valuer |                   | Market value attributable to investment property |                   | Market value attributable to fixed asset |                  |                |  |
| <b>Land</b>               |                                      |                                      |                                      |                   |  |                   |  |                  |                |  |
| NIC Building Karachi      | M.J. Surveyors (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 3,008,250                            | 2,607,150         | 2,205,950  | 1,911,823         | 802,300                                  | 695,327          |                |  |
| NIC Building Islamabad    | M.S. Global Adjusters (Pvt.) Limited | M.S. Global Adjusters (Pvt.) Limited | 8,100,000                            | 6,912,000         | 5,941,700  | 5,923,584         | 1,158,300                                | 988,416          |                |  |
| NIC House DHA Karachi     | M.J. Surveyors (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 156,250                              | 187,500           | 114,578  | 137,494           | 41,672                                   | 50,006           |                |  |
| 128 Upper Mall Lahore     | MSK Enterprises (Pvt.) Limited       | FKS Building Services                | 272,708                              | 280,820           | 272,708  | 280,820           | -  | -                |                |  |
| Dahi Karachi              | M.J. Surveyors (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 750,000                              | 750,000           | 750,000  | 750,000           | -  | -                |                |  |
| Airport Road Lahore       | MSK Enterprises (Pvt.) Limited       | FKS Building Services                | 1,730,100                            | 1,810,500         | 1,730,100  | 1,810,500         | -  | -                |                |  |
| Shah dien Building Lahore | MSK Enterprises (Pvt.) Limited       | FKS Building Services                | 1,460,500                            | 1,428,750         | 1,460,500  | 1,428,750         | -  | -                |                |  |
|                           |                                      |                                      | 15,477,808                           | 13,976,720        | 13,475,636                                       | 12,242,971        | 2,002,272                                | 1,733,749        |                |  |
| <b>Building</b>           |                                      |                                      |                                      |                   |  |                   |  |                  |                |  |
| NIC Building Karachi      | M.J. Surveyors (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 770,605                              | 647,596           | 554,065  | 465,622           | 216,540                                  | 181,975          |                |  |
| NIC Building Islamabad    | M.S. Global Adjusters (Pvt.) Limited | M.S. Global Adjusters (Pvt.) Limited | 1,516,636                            | 1,530,689         | 1,299,757  | 1,311,800         | 216,879                                  | 218,889          |                |  |
| NIC House DHA Karachi     | M.J. Surveyors (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 15,056                               | 12,179            | 15,056   | 12,179            | -  | -                |                |  |
| Shah dien Building Lahore | MSK Enterprises (Pvt.) Limited       | FKS Building Services                | 21,979                               | 21,818            | 21,979   | 21,818            | -  | -                |                |  |
| Liberty Tower Dubai       | RBS Associates (Pvt.) Limited        | RBS Associates (Pvt.) Limited        | 5,106,705                            | 3,008,434         | 5,106,705  | 3,008,434         | -  | -                |                |  |
|                           |                                      |                                      | 7,430,981                            | 5,220,716         | 6,997,562  | 4,819,853         | 433,419                                  | 400,864          |                |  |
| <b>Total market value</b> |                                      |                                      | <b>22,908,789</b>                    | <b>19,197,436</b> | <b>20,473,098</b>                                | <b>17,062,824</b> | <b>2,435,691</b>                         | <b>2,134,613</b> |                |  |

7.1.4 Fair value of building situated at liberty towers dubai amounts to AED: 66.072 million (2022: AED : 48.453 million) in terms of foreign currency.

7.2 Status of properties under litigation

7.2.1 10 Acre Plot situated at Korangi Deh Phihal, Karachi (FIR No. 21/2010 dated November 22, 2010)

NICL purchased 10 Acre land situated at Korangi Deh Phihal, Karachi as per the approval of the then Board of Directors from Mr. Khalid Anwer at a cost of Rs. 900 million excluding government levies. Sale agreement in this respect was duly executed on August 19, 2009, possession was handed over to NICL, title was duly transferred in the name of NICL vide conveyance deed August 21, 2009 and mutation was done on November 20, 2009. Prior to purchase of the said land, a Pakistan Bank's Association (PBA) approved valuer namely Consultancy Support Services Limited was commissioned by NICL for carrying out the land pre-purchase valuation which valued this land at Rs. 92.5 million per acre (Rs. 925 million) on June 11, 2009. Further, in response to a letter No. NICL/LD/HO/85 dated June 9, 2009 the Executive District Officer (Revenue), City District Government Karachi in its letter No. EDO/REV/1473/2009 dated June 25, 2009 mentioned that the cost of per acre of this land as informed by the District Officer (Revenue), City District Government Karachi vide its letter No. DO/REV/K/R.B/3478/2008 dated July 30, 2008 is Rs. 90.50 million per acre (Rs. 905 million).

Prior to the registration of FIR, the complainant namely the Ministry of Commerce, Government of Pakistan, got an independent valuation done on the orders of the National Assembly Standing Committee on Commerce by a State Bank of Pakistan approved valuer namely M/s. Eastern Surveyor, who valued the land at Rs. 975 million on April 3, 2010.

After registration of FIR, Federal Investigation Agency (FIA) and NICL got a valuation of the land in question done by another State Bank of Pakistan approved valuer namely M/s. Ahmed Associates who valued the land at Rs. 925 million on December 6, 2010. Later, FIA/NICL got yet another valuation done of the same land by the same valuer at Rs. 700 million as at August 2009 on January 5, 2011. Finally, on March 03, 2011 FIA and the company got another valuation of the land done by National Engineering Services Pakistan (Private) Limited (NESPAK) which valued the land at Rs. 412.61 million as on July 2009.

Mr. Khalid Anwer, without any admission of guilt or wrong doing or irregularity on his part or on the part of any other person, volunteered to conditionally deposit the differential amount of Rs. 490 million under the believe and impression that the case regarding purchase of aforesaid land is sub judice before the learned Special Judge (Central) - II, Karachi and the matter would be decided qua allegations upon conclusion of a trial wherein Mr. Khalid Anwer has all the opportunity to defend the transaction under reference and challenge the veracity of the valuation done by NESPAK or by another valuer(s). The differential amount was tendered with the sole purpose of saving the applicant's good repute and to avoid any inconvenience and discomfort and is conditionally deposited. The entire amount of Rs. 490 million, recovery based on NESPAK valuation, has already been received from the sellers and credited to NICL bank accounts. No amount is outstanding in this case.

After several letters from the seller, through his legal council showing his reservation on NESPAK valuation, in the final reply dated September 22, 2011 NESPAK concluded the matter writing "The land in question at the time of purchase could justifiably be evaluated on the basis of its commercial value, which could range between Rs. 65 million to Rs. 67 million per acre for this 10 acre piece of land".

All accused persons have been released on bail on the ground of statutory delay in decision of the case and on the basis of important development in the case that the alleged embezzled amount worth Rs. 490 million have fully been realized and paid in the account of NICL.

As at December 31, 2023, the value of the property assessed by RBS Associates (Pvt) Limited is Rs. 750 million (2022:Rs. 750 million).

The case was decided / disposed of on 08-12-2018, whereby Ayyaz Khan Niazi and other accused persons were convicted/sentenced for imprisonment of seven years each. The accused persons have filed appeals against order/judgment dated 08-12-2018, before the High Court of Sindh at Karachi, which is pending.

The above case was disposed of on 08-12-2018 by Accountability Court No. III at Karachi, whereby the accused persons were sentenced. Appeals filed by accused persons were accepted vide judgment dated 08-10-2019 passed by the Sindh High Court and all accused persons were acquitted. Appeals were filed by NAB against the orders/judgment of Sindh High Court before the Supreme Court of Pakistan, but the same was dismissed on 10-12-2019. Accordingly, this instant matter is no more in field and finally all accused persons have been acquitted.

Following is a summary of amounts recoverable out of the property:

Purchase price  
Less: Value as determined by NESPAK  
Add: Other charges  
Difference recoverable  
Less: Recovered in prior years  
Balance recoverable

| Rupees in '000 |           |
|----------------|-----------|
|                | 900,000   |
|                | (412,610) |
|                | 2,610     |
|                | 490,000   |
|                | (490,000) |
|                | -         |

7.2.2 20 Kanal 2 Marala (FIR No. 29/2010 dated November 13, 2010)

NICL purchased 20 Kanal 2 Marala plot of land in July 2009 as per the approval of the then Board of Directors from Mr. Mohsin Habib Warraich situated at Airport Road, Lahore. NICL paid Rs. 1,067,755,000 to the Seller (Mohsin Habib Warraich) as price of land. Sale deeds were executed in July 2009 in favour of NICL and the land was duly mutated / transferred.

NICL arranged valuation of this land from M/s. Tristar International who valued it at Rs. 1,326,000,000 on June 29, 2009. Another valuation arranged by NICL from M/s. Medallion Services resulted in valuation of this land at Rs. 61,500,000 per Kanal (Rs. 1,236,150,000) on June 16, 2009.

On a valuation arranged for and conducted on the instructions of Ministry of Commerce, Islamabad in March 2010 the valuer M/s. S. A Associates determined the value of the land at Rs. 1,266,300,000.

Ministry of commerce through M/s. National Evaluation Company arranged valuation of this land who also valued it at Rs. 1,206,000,000 on March 31, 2010.

During the course of investigation after FIR, FIA arranged valuation of the property through M/s. Ahmed Associates in December 2010, who valued the property at Rs. 984,900,000 as at July 2009 on December 20, 2010. Mr. Mohsin Habib Warraich, without admission of any guilt or wrong doing or irregularity, conditionally deposited the differential amount of Rs. 80,400,000.

Subsequently, FIA arranged another valuation of the property through NESPAK, who assessed the value at Rs. 562,500,000 as at July 2009 in January 2011 with differential recoverable amount of Rs. 505,255,000. By the efforts of FIA, Mr. Mohsin Habib Warraich made a conditional offer to pay back this differential amount.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

On March 30, 2011 Mr. Mohsin Habib Waraich through his authorized attorney, in good faith and without admission / confession of any wrong doing / guilt / offence and without prejudice to the trial and defence therein made conditional / without prejudice offer of paying the differential amount of Rs. 505,255,000 subject to the decision of the case upon conclusion of the trial and in case of acquittal and discharge the offer shall deemed to be withdrawn and of no legal effect and NICL will be obligated to refund the alleged differential received under protest along with the cost of funds and such offer is made without prejudicing / affecting right to defend instant transaction in trial court and /or to challenge the valuation done by NESPAK before the court of competent jurisdiction.

The differential amount of Rs. 505,255,000 has been conditionally tendered in the following manner:

- a The amount of Rs. 80,400,000 shall be adjusted towards payment of differential amount of Rs. 505,255,000 leaving the balance of Rs. 424,855,000.
- b The balance of Rs. 424,855,000 along with interest @ SBP discount rate will be paid in five years through ten bi-annual instalments of Rs. 42,000,000 each except the last instalment of Rs. 44,400,000. The payment of the last instalment shall become due on November 01, 2016. Refer note 1.2 for details of the cheques along with the dates of their dishonour and FIRs.

NICL has also filed application for auction of property of accused person for recovery of valuable amount of the company, which is pending for arguments.

As at December 31, 2023, the value of the property assessed by 'FKS Building Services is Rs. 1,730 million (2022: by FKS Building Services, Rs. 1,810 million).

In compliance of Supreme Court Order dated 22.11.2013, passed in Suo moto case NO. 18/2010, this case was transferred on 02.01.2014 from the court of Special Judge (Anti-Corruption, Lahore to NAB court No.2 Lahore.

The above noted matter was fixed before Accountability Court NO. II at Lahore on 06.06.2017. The Court adjourned the case for further arguments on 02.05.2019.

The above case was disposed of on 02-01-2020 by Accountability Court No. IV at Karachi, whereby the all accused persons were acquitted. Accordingly, this instant matter is no more in field. As per information NAB is in process to file appeals before Lahore High Court against judgment dated 02-01-2020 passed by the Accountability Court. However, NICL's ten Execution Applications for recovery/realization of 422 million are still pending before Civil Court, Lahore. The opinion of Aslam Law Associates related to recovery of Rs.422 million is that Habib Mohsin Warraich is no more under legal obligation to pay this amount to NICL unless judgment of acquittal is challenged and reversed in appeal.

Following is a summary of amounts recoverable out of the above mentioned property:

|   | Rupees in '000 |
|---|----------------|
| Purchase price  | 1,067,755      |
| Less: Value as determined by NESPAK                   | (562,500)      |
| Difference recoverable                                | 505,255        |
| Less: Recovered up to the balance sheet date          | (80,400)       |
| Balance recoverable                                   | 424,855        |
| Unrealized cheques (April 2012 – 2016)                |                |
| 10 Bounced cheques of dates April 2012- November 2016 | -              |
| Balance recoverable                                   | 424,855        |

**7.2.3 Office space in Liberty Towers, DIFC Area, Dubai (FIR No. 14/2010 dated November 22, 2010)**

In July 2009, NICL purchased 6 units / offices measuring 27,429 sq. fts in Liberty Towers, Dubai International Financial Centre (DIFC) Area, Dubai at a cost of Rs. 1,649,646,764 (US \$ 19,990,000 equivalent o AED 73,463,250) excluding levies of Rs. 49,291,429 in July 2009 as per the approval of the then Board of Directors. NICL arranged a valuation of this property through M/s. JAJ Consultants, Dubai who valued the property at AED 74,075,000 (Rs. 1,741,332,480 equivalent to US \$ 20,909,372) on June 30, 2009.

On the direction of Supreme Court of Pakistan, the FIA initiated enquiry and got the property valued from M/s. Hayptons International, Dubai who valued the property as at December 31, 2010 at AED 76,800,000 (Rs. 1,692,609,180).

In the context of judicial proceeding against the procurement of 6 office units in Liberty House, DIFC Area, Dubai, M/s. Hayptons International, Dubai valuation report is considered more reliable. Accordingly, no recovery has been initiated by the FIA.

FIR No. 14 of 2010 was registered under section 409, 420, 109, PPC read with Section 5(2) of PCA-II, 1947, at Police Station FIA Corporate Crime Circle Karachi on November 22, 2010 on written communication sent by secretary Commerce to Director General FIA. It was requested to probe into matter regarding office Space in Dubai measuring 27000 sq. ft. had been purchased in July 2009 at the rate of UAE Dirham 2700 per sq. ft. It was alleged that this was an exorbitant amount and it had caused loss the national exchequers.

The Investigation Officer, concerned Deputy Director and Assistant Director (Legal) have suggested that due to lack of evidence the case is not made out. The Director General FIA has approved the recommendation made by Director FIA Sindh and directed to sent the case to the Ministry of Interior for withdrawal of under section 494 Cr.P.C. matter is pending in Court for final adjudication.

The matter was fixed on December 22, 2014 for arguments on application under section 265-K of Criminal procedure code. The advocates for the accused persons have contented that NICL sustained no loss in this transection; therefore, no case is made out against the accused persons. After arguments at length on said application from both of the sides, the say was allowed and all accused persons have been acquitted. Accordingly the case was disposed of on December 22, 2014. NAB has filed appeal in the high court of Sindh against the said order vide CR.ACC.AOC.Appeal No.01 of 2015 dated January 08, 2015.

As at December 31, 2023, the value of the property assessed by RBS Associates (Pvt) Limited 5,106 million (2022:Rs. 3,008 million).

Reference No. 1/2014 (FIR No. 14/2010), it is submitted that that the case is pending before Accountability Court No. III at Karachi. The case was fixed before the said Court on 07-01-2020 for submission of report. However, the sale was adjourned until 29-01-2020 without any progress.

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NATIONAL INSURANCE COMPANY LIMITED  
NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS  
FOR THE YEAR ENDED DECEMBER 31, 2023

8 INVESTMENTS IN SUBSIDIARY AND ASSOCIATE

|      | Note | 2023           | 2022    |
|------|------|----------------|---------|
|      |      | Rupees in '000 |         |
| Cost |      | 358,560        | 358,560 |

8.1 The company's interests in its subsidiaries were as follows:

| Name  | Country of Incorporation | Assets  | Liabilities | Revenues | Profit/ (loss) | % Interest held |
|---|--------------------------|---------|-------------|----------|----------------|-----------------|
| Rupees in '000  |                          |         |             |          |                |                 |
| Civic Centers Company (Pvt) Ltd<br>Total at the end of 2023 | Pakistan                 | 424,172 | 76,186      | 11,104   | 3,695          | 100%            |
|   |                          | 424,172 | 76,186      | 11,104   | 3,695          | -               |
| Civic Centers Company (Pvt) Ltd<br>Total at the end of 2022 | Pakistan                 | 422,789 | 76,497      | 10,294   | 3,869          | 100%            |
|   |                          | 422,789 | 76,497      | 10,294   | 3,869          | -               |

8.2 The post of Chief Executive of Civic Centre Company (Private) Limited was vacant. The par value per share is Rs.10 each. The break up value of Civic Centre Company (Private) Limited as per unaudited financial statements as at December 31, 2023 is Rs. 7.81 (2022: Rs. 7.73). The break up value per share shall increase over its cost in the event of disposal of hotel building which is under consideration of relevant government authorities.

During the financial year ended December 31, 2005, the Company received a memo reference U.O. No. 4 (33) / 05 (I-II) / 05, dated October 4, 2005 from Prime Minister Secretariat through Ministry of Commerce (MoC) letter reference No. 7 (5) 98 - Admn.II dated October 11, 2005 regarding sale of Services International Hotel, Lahore a property of Civic Centres Company (Private) Limited (CCCL). The MoC letter required us to furnish detailed / updated brief along with comments after thorough examination of proposal of the Governor of Punjab received by MoC and Prime Minister Secretariat.

Punjab Cooperative Board for Liquidation (PCBL) has claimed that it is entitled to get 25% share in the value of the Services International Hotel Building. The CCCL is of the view that PCBL can only claim 6% of the value of hotel building, as the amount payable to PCBL of Rs. 11.9 million represents 6% of the sale proceeds of Rs. 190 million. CCCL has declined the claim of PCBL, which in turn has filed a suit against the Company and CCCL. This matter was discussed with the Governor of Punjab, who suggested the following:

a) both parties withdraw court cases filed against each other; and

b) building would be transferred to Privatization Commission, the Company and PCBL would ensure that the vacant possession is handed over to the Privatization Commission, and they would dispose off the building through public auction, and the sales proceeds may be apportioned in the ratio of 75:25 between the Company and PCBL respectively.

The Company has responded to MoC through its letter dated October 11, 2005 and clarified its position and suggested that the Privatization Commission should dispose off the CCCL with all its assets and liabilities and not only the hotel building and the sale proceeds be distributed between the Company and the PCBL in the ratio of 94:6 respectively. However, if Prime Minister Secretariat desires to implement the Governor of Punjab's proposal i.e. distribution of sale proceeds in 75:25 ratio, a directive from the Prime Minister Secretariat will have to be issued as the board of the Company is not likely to agree to the proposed ratio of the sharing of the sale proceeds.

An order has been issued from the Prime Minister Secretariat for the privatization of the Service International Hotel Lahore and sharing of proceeds in the ratio of 75:25 as proposed by the Governor of Punjab.

If the distribution of the sale proceeds of the hotel building is made at 75:25 between the Company and PCBL, the Company would be able to recover the carrying value of the investment (Rs. 358,560,000) as the fair value of the hotel building is significantly higher than the cost of the building appearing in the CCCL's financial statements for the year ended December 31, 2016.

Due to above mentioned details the break up value per share shall increase over its cost in the event of disposal of hotel building and therefore, no impairment has been charged.

9 INVESTMENTS IN EQUITY SECURITIES

|                    | Note | 2023           | 2022      |
|--------------------|------|----------------|-----------|
|                    |      | Rupees in '000 |           |
| Available for Sale | 9.1  | 4,510,533      | 3,228,095 |
| Held for Trading   | 9.2  | 2,332,022      | 1,553,537 |
|                    |      | 6,842,554      | 4,781,632 |

|                | 2023 |                                    |                | 2022 |                                    |                |
|----------------|------|------------------------------------|----------------|------|------------------------------------|----------------|
| Note           | Cost | Accumulated Impairment / Provision | Carrying value | Cost | Accumulated Impairment / Provision | Carrying value |
| Rupees in '000 |      |                                    |                |      |                                    |                |

9.1 AVAILABLE FOR SALE-QUOTED

|                         |       |           |   |           |          |           |
|-------------------------|-------|-----------|---|-----------|----------|-----------|
| Others                  |       |           |   |           |          |           |
| Listed Shares           | 9.1.1 | 97,125    | - | 97,125    | (17,392) | 79,733    |
| Unrealized gain/ (loss) |       |           |   | 25,652    |          |           |
| Mutual Funds            | 9.1.4 | 1,828,748 |   | 3,179,309 |          | 3,639,757 |
| Unrealized gain/ (loss) | 9.1.4 |           |   | 1,208,407 |          | (491,395) |
|                         |       | 1,925,873 | - | 4,510,533 | (17,392) | 3,228,095 |

9.1.1 Available for Sale-Listed Shares

| 2023<br>(Number of Shares) | 2022      | Name of the Company  | 2023<br>Market Value<br>Rupees in '000 | 2022   | 2023<br>Cost<br>Rupees in '000 | 2022   |
|----------------------------|-----------|--|--|--------|--------------------------------|--------|
| 100,000                    | 100,000   | Food Producers<br>Mirza Sugar                              | 502                                    | 502    | 1,000                          | 1,000  |
| 2,275,232                  | 2,275,232 | Modarba<br>First Prudential Modaraba                       | 4,366                                  | 4,049  | 10,000                         | 10,000 |
| 795,980                    | 795,980   | KASB Modaraba  | 1,075                                  | 1,074  | 4,124                          | 4,124  |
| 526,000                    | 526,000   | Household Goods<br>Toweliers Limited                       | 100,261                                | 61,147 | 9,994                          | 9,994  |
| 7,200,657                  | 7,200,657 | Financial Services<br>First Dawood Investment Bank Limited | 16,634                                 | 12,961 | 72,007                         | 72,007 |
|                            |           | Total  | 122,817                                | 79,733 | 97,125                         | 97,125 |

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**  
**9.1.2 Listed Shares**

|   | Note  | 2023           | 2022     |
|---|-------|----------------|----------|
|   |       | Rupees in '000 |          |
| Cost  |       |                |          |
| Provision For Impairment  | 9.1.3 | 97,125         | 97,125   |
|   |       | -              | (17,392) |
|   |       | 97,125         | 79,733   |
| 9.1.3 Provision for Impairment  |       |                |          |
| Provision at the beginning of the year (Reversal) / Charge for the year |       | 17,392         | 70,056   |
| Provision at the end of the year  |       | (17,392)       | (52,664) |
|   |       | 10             | 17,392   |

**9.1.4 Available for Sale-Mutual Funds**

| 2023              | 2022       | Name of the fund                      | 2023           | 2022      | 2023           | 2022      |
|-------------------|------------|---------------------------------------|----------------|-----------|----------------|-----------|
| (Number of Units) |            |                                       | Market Value   |           | Cost           |           |
|                   |            |                                       | Rupees in '000 |           | Rupees in '000 |           |
| 3,940,091         | 3,801,174  | Open-end fund                         |                |           |                |           |
| 14,123,295        | 14,123,294 | Unit Trust of Pakistan                | 799,366        | 579,755   | 295,987        | 274,883   |
| 1,639,258         | 1,658,305  | Meezan Islamic Fund                   | 1,153,747      | 779,039   | 218,416        | 218,416   |
| 17,840,542        | 17,840,542 | Pakistan Income Fund                  | 111,372        | 96,911    | 81,813         | 71,970    |
| 4,324,703         | 4,324,703  | National Investment Unit Trust (NIUT) | 1,354,454      | 1,031,540 | 960,000        | 960,000   |
|                   |            | N.I.T Equity Market Opportunity Fund  | 968,777        | 661,117   | 272,532        | 272,532   |
|                   |            | Total                                 | 4,387,716      | 3,148,362 | 1,628,748      | 1,797,801 |

**9.2 HELD FOR TRADING - QUOTED**

| Others   | Note  | 2023           | 2022      |
|--|-------|----------------|-----------|
| HELD FOR TRADING                                     |       | Rupees in '000 |           |
| Investments in ordinary shares of listed companies   | 9.2.1 | 2,329,951      | 1,550,107 |
| Investments in preference shares of listed companies | 9.2.2 | 2,071          | 3,431     |
|  |       | 2,332,022      | 1,553,538 |

**9.2.1 Investment in ordinary shares -face value of Rs.10 each**

| Name of the investee entity                | 2023      |  |                | 2022      |  |                |
|--|-----------|--|----------------|-----------|--|----------------|
|  | Cost      | Unrealized Gain or (Loss) for the year | Carrying Value | Cost      | Unrealized Gain or (Loss) for the year | Carrying Value |
|  |           | — Rupees in '000 —                     |                |           | — Rupees in '000 —                     |                |
| <b>Fertilizer</b>                          |           |  |                |           |  |                |
| Fauji Fertilizer Company Limited           | 109,671   | 16,088                                 | 125,759        | 111,404   | (1,733)                                | 109,671        |
| Fauji Fertilizer Bin Qasim Limited         | 37,497    | 40,531                                 | 78,028         | 61,150    | (23,653)                               | 37,497         |
| Arif Habib Corporation Limited             | 89,156    | 3,831                                  | 92,987         | 92,184    | (3,028)                                | 89,156         |
| <b>Chemical</b>                            |           |  |                |           |  |                |
| Lotto Pakistan Limited                     | 147,239   | 6,196                                  | 153,435        | 78,167    | 69,072                                 | 147,239        |
| <b>Banks</b>                               |           |  |                |           |  |                |
| National Bank of Pakistan Limited          | 11,830    | 4,273                                  | 16,103         | 17,301    | (5,471)                                | 11,830         |
| <b>Power Generation &amp; Distribution</b> |           |  |                |           |  |                |
| Hub Power Company Limited                  | 546,282   | 447,734                                | 1,014,016      | 619,200   | (72,918)                               | 546,282        |
| Kot Addu Power Company Limited             | 31,499    | 2,104                                  | 33,603         | 38,200    | (6,701)                                | 31,499         |
| Nisbat Power Limited                       | 69,680    | 40,750                                 | 110,430        | 75,764    | (6,084)                                | 69,680         |
| <b>Textile Composite</b>                   |           |  |                |           |  |                |
| Argard Nine Limited                        | 33,254    | 4,220                                  | 37,474         | 60,317    | (27,063)                               | 33,254         |
| <b>Technology &amp; Communication</b>      |           |  |                |           |  |                |
| Pakistan Telecommunication Company Limited | 15,967    | 16,046                                 | 32,013         | 22,720    | (6,753)                                | 15,967         |
| <b>Oil &amp; Gas Marketing Companies</b>   |           |  |                |           |  |                |
| Pakistan State Oil Company Limited         | 78,168    | 17,762                                 | 95,930         | 98,753    | (20,585)                               | 78,168         |
| Attock Refinery Limited                    | 27,386    | 35,683                                 | 62,469         | 27,571    | (185)                                  | 27,386         |
| Sui Northern Gas Company Limited           | 10,696    | 10,346                                 | 20,942         | 6,918     | 3,778                                  | 10,696         |
| Sui Southern Gas Company Limited           | 6,874     | 1,573                                  | 8,447          | 9,614     | (2,740)                                | 6,874          |
| <b>Oil &amp; Gas Exploration Companies</b> |           |  |                |           |  |                |
| Pakistan Petroleum Limited                 | 61,441    | 42,301                                 | 103,722        | 71,459    | (10,018)                               | 61,441         |
| Pakistan Oilfields Limited                 | 169,711   | 12,567                                 | 182,278        | 154,656   | 15,055                                 | 169,711        |
| <b>Cement</b>                              |           |  |                |           |  |                |
| DG Khan Cement Limited                     | 101,047   | 50,406                                 | 151,453        | 161,433   | (60,386)                               | 101,047        |
| <b>Industrial Metal and Mining</b>         |           |  |                |           |  |                |
| Aisha Steel Mills Limited                  | 2,709     | 155                                    | 2,864          | 4,553     | (1,844)                                | 2,709          |
|  | 1,550,107 | 779,844                                | 2,329,951      | 1,711,365 | (161,258)                              | 1,550,107      |

**9.2.2 Investment in Preference shares of listed companies - face value of Rs. 10 each**

|                             | 2023               | 2022       | 2023           | 2022      |
|-----------------------------|--------------------|------------|----------------|-----------|
|                             | (Number of Shares) |            | Market Value   |           |
|                             |                    |            | Rupees in '000 |           |
| Industrial Metal and Mining | 235,338            | 235,338    | 2,071          | 3,431     |
| Aisha Steel Mills Limited   | 235,338            | 235,338    | 2,071          | 3,431     |
| Grand Total                 | 37,818,345         | 36,642,909 | 2,332,022      | 1,553,538 |

*2/2/24*

|                           | Note | 2023          |                                     |                | 2022       |                                     |                |
|---------------------------|------|---------------|-------------------------------------|----------------|------------|-------------------------------------|----------------|
|                           |      | Cost          | Impairment / Provision for the year | Carrying value | Cost       | Impairment / Provision for the year | Carrying value |
|                           |      | Rupees in 000 |                                     |                |            |                                     |                |
| Government securities     |      |               |                                     |                |            |                                     |                |
| Held to maturity          |      |               |                                     |                |            |                                     |                |
| Pakistan investment bonds | 10.1 | 13,072,926    | -                                   | 13,603,200     | 28,629,237 | -                                   | 26,275,910     |
| Treasury bills            | 10.2 | 37,799,827    | -                                   | 40,071,538     | 11,863,919 | -                                   | 22,427,263     |
|                           |      | 50,883,753    | -                                   | 53,674,738     | 40,493,156 | -                                   | 48,703,173     |

10.1 Government securities-Held to Maturity

10.1.1 Pakistan Investment Bonds

| Face value<br>Rupees in '000 | Profit Rate | Tenure  | Maturity Date      | 2023           |                | 2022       |                |
|------------------------------|-------------|---------|--------------------|----------------|----------------|------------|----------------|
|                              |             |         |                    | Cost           | Carrying value | Cost       | Carrying value |
|                              |             |         |                    | Rupees in '000 |                |            |                |
| 3,300,000                    | 13.00%      | 10 year | September 19, 2029 | 3,008,947      | 3,694,793      | 3,008,947  | 3,070,679      |
| 116,000                      | 13.00%      | 10 year | March 26, 2025     | 108,707        | 114,114        | 108,707    | 113,185        |
| 7,000,000                    | 11.00%      | 5 year  | July 12, 2023      | -              | -              | 5,619,273  | 6,637,420      |
| 7,000,000                    | 11.00%      | 5 year  | September 19, 2024 | 6,492,342      | 6,909,194      | 6,492,342  | 6,793,535      |
| 3,020,000                    | 9.50%       | 5 year  | September 19, 2024 | 3,025,194      | 3,021,392      | 3,025,194  | 3,023,524      |
| 500,000                      | 8.75%       | 10 year | July 12, 2028      | 437,736        | 463,788        | 437,736    | 457,777        |
| 4,000,000                    | 8.00%       | 5 year  | July 12, 2023      | -              | -              | 3,973,232  | 3,994,769      |
| 2,000,000                    | 7.00%       | 3 year  | August 29, 2023    | -              | -              | 1,935,606  | 1,985,021      |
| 26,936,000                   |             |         | Total              | 13,072,926     | 13,603,200     | 24,801,037 | 26,275,910     |

10.2 Treasury Bills

| Face value<br>Rupees in '000 | Profit Rate | Tenure    | Maturity Date     | Cost | 2023           | 2022      | Carrying value |
|------------------------------|-------------|-----------|-------------------|------|----------------|-----------|----------------|
|                              |             |           |                   |      | Carrying value | Cost      |                |
|                              |             |           |                   |      | Rupees in '000 |           |                |
| 500,000                      | 15.69%      | 06 Months | January 12, 2023  | -    | -              | 463,717   | 497,807        |
| 500,000                      | 15.68%      | 06 Months | January 26, 2023  | -    | -              | 463,741   | 495,019        |
| 1,000,000                    | 15.69%      | 06 Months | January 26, 2023  | -    | -              | 927,433   | 990,032        |
| 500,000                      | 15.79%      | 06 Months | February 9, 2023  | -    | -              | 463,500   | 492,179        |
| 500,000                      | 15.81%      | 06 Months | February 23, 2023 | -    | -              | 463,456   | 489,358        |
| 500,000                      | 15.80%      | 06 Months | February 23, 2023 | -    | -              | 463,493   | 489,369        |
| 500,000                      | 15.84%      | 06 Months | March 9, 2023     | -    | -              | 463,398   | 486,526        |
| 1,000,000                    | 15.85%      | 06 Months | March 9, 2023     | -    | -              | 926,757   | 973,037        |
| 500,000                      | 15.95%      | 06 Months | March 24, 2023    | -    | -              | 462,985   | 483,414        |
| 500,000                      | 15.68%      | 06 Months | April 6, 2023     | -    | -              | 463,740   | 481,073        |
| 500,000                      | 15.69%      | 06 Months | April 21, 2023    | -    | -              | 463,536   | 478,081        |
| 2,500,000                    | 15.55%      | 06 Months | April 21, 2023    | -    | -              | 2,319,190 | 2,391,316      |
| 500,000                      | 15.67%      | 03 Months | January 12, 2023  | -    | -              | 482,595   | 497,721        |
| 1,000,000                    | 15.50%      | 03 Months | January 12, 2023  | -    | -              | 965,557   | 995,490        |
| 500,000                      | 15.73%      | 06 Months | May 4, 2023       | -    | -              | 463,636   | 475,424        |
| 500,000                      | 15.66%      | 06 Months | May 4, 2023       | -    | -              | 463,785   | 475,525        |
| 500,000                      | 15.70%      | 03 Months | January 26, 2023  | -    | -              | 482,565   | 494,811        |
| 250,000                      | 15.60%      | 03 Months | January 26, 2023  | -    | -              | 241,336   | 247,421        |
| 500,000                      | 15.73%      | 06 Months | May 18, 2023      | -    | -              | 463,638   | 472,628        |
| 1,000,000                    | 15.73%      | 06 Months | May 18, 2023      | -    | -              | 927,271   | 945,253        |
| 500,000                      | 15.69%      | 03 Months | February 9, 2023  | -    | -              | 482,570   | 491,908        |
| 600,000                      | 15.70%      | 03 Months | February 9, 2023  | -    | -              | 579,078   | 590,286        |
| 500,000                      | 16.88%      | 03 Months | February 23, 2023 | -    | -              | 481,303   | 488,203        |
| 300,000                      | 16.19%      | 03 Months | February 23, 2023 | -    | -              | 289,221   | 293,199        |
| 300,000                      | 16.44%      | 03 Months | February 23, 2023 | -    | -              | 289,061   | 293,096        |
| 300,000                      | 16.69%      | 03 Months | February 23, 2023 | -    | -              | 288,900   | 292,997        |
| 500,000                      | 16.52%      | 06 Months | June 1, 2023      | -    | -              | 461,942   | 468,424        |
| 600,000                      | 16.23%      | 06 Months | June 1, 2023      | -    | -              | 555,082   | 562,733        |
| 700,000                      | 16.48%      | 06 Months | June 1, 2023      | -    | -              | 646,849   | 655,902        |
| 700,000                      | 16.73%      | 06 Months | June 1, 2023      | -    | -              | 646,105   | 655,285        |
| 500,000                      | 16.85%      | 06 Months | June 15, 2023     | -    | -              | 461,245   | 464,865        |
| 700,000                      | 16.90%      | 06 Months | June 15, 2023     | -    | -              | 645,597   | 650,678        |
| 500,000                      | 15.97%      | 03 Months | March 9, 2023     | -    | -              | 481,204   | 485,008        |
| 350,000                      | 17.00%      | 03 Months | March 9, 2023     | -    | -              | 336,823   | 339,489        |
| 500,000                      | 16.81%      | 06 Months | June 29, 2023     | -    | -              | 461,326   | 461,963        |
| 500,000                      | 16.80%      | 06 Months | June 29, 2023     | -    | -              | 461,353   | 461,990        |
| 500,000                      | 16.83%      | 06 Months | June 29, 2023     | -    | -              | 461,299   | 461,936        |
| 500,000                      | 16.96%      | 03 Months | April 6, 2023     | -    | -              | 478,221   | 478,887        |
| 500,000                      | 16.93%      | 03 Months | April 6, 2023     | -    | -              | 478,264   | 478,929        |

Roller

NATIONAL INSURANCE COMPANY LIMITED  
NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS  
FOR THE YEAR ENDED DECEMBER 31, 2023

|           |        |           |                   |            |            |            |            |
|-----------|--------|-----------|-------------------|------------|------------|------------|------------|
| 500,000   | 22.92% | 06 Months | January 11, 2024  | 448,709    | 497,182    | -          | -          |
| 1,000,000 | 22.88% | 06 Months | January 11, 2024  | 897,556    | 994,373    | -          | -          |
| 1,000,000 | 22.89% | 06 Months | January 11, 2024  | 897,556    | 994,371    | -          | -          |
| 1,000,000 | 22.90% | 06 Months | January 11, 2024  | 897,510    | 994,369    | -          | -          |
| 1,000,000 | 22.91% | 06 Months | January 11, 2024  | 897,476    | 994,367    | -          | -          |
| 1,000,000 | 22.92% | 06 Months | January 11, 2024  | 897,436    | 994,365    | -          | -          |
| 1,000,000 | 22.93% | 06 Months | January 11, 2024  | 897,395    | 994,362    | -          | -          |
| 1,100,000 | 22.95% | 06 Months | January 11, 2024  | 897,355    | 994,360    | -          | -          |
| 500,000   | 22.87% | 06 Months | January 11, 2024  | 887,047    | 1,003,794  | -          | -          |
| 1,000,000 | 22.82% | 06 Months | January 25, 2024  | 448,314    | 493,258    | -          | -          |
| 1,000,000 | 22.84% | 06 Months | January 25, 2024  | 896,831    | 986,543    | -          | -          |
| 1,000,000 | 22.86% | 06 Months | January 25, 2024  | 896,749    | 986,532    | -          | -          |
| 1,000,000 | 22.88% | 06 Months | January 25, 2024  | 896,668    | 986,522    | -          | -          |
| 1,000,000 | 22.90% | 06 Months | January 25, 2024  | 896,587    | 986,511    | -          | -          |
| 1,000,000 | 22.92% | 06 Months | January 25, 2024  | 896,506    | 986,501    | -          | -          |
| 500,000   | 22.73% | 06 Months | January 25, 2024  | 896,425    | 986,490    | -          | -          |
| 500,000   | 22.70% | 06 Months | February 8, 2024  | 449,110    | 489,375    | -          | -          |
| 500,000   | 22.75% | 06 Months | February 8, 2024  | 449,160    | 489,385    | -          | -          |
| 500,000   | 24.79% | 06 Months | February 8, 2024  | 449,060    | 489,364    | -          | -          |
| 500,000   | 22.80% | 06 Months | March 7, 2024     | 448,001    | 480,055    | -          | -          |
| 500,000   | 22.85% | 06 Months | March 21, 2024    | 448,959    | 477,564    | -          | -          |
| 500,000   | 22.14% | 03 Months | April 4, 2024     | 448,859    | 473,586    | -          | -          |
| 500,000   | 22.39% | 06 Months | January 11, 2024  | 475,759    | 497,114    | -          | -          |
| 2,000,000 | 22.15% | 03 Months | April 16, 2024    | 449,790    | 470,205    | -          | -          |
| 2,100,000 | 22.20% | 03 Months | January 11, 2024  | 1,002,994  | 1,088,452  | -          | -          |
| 500,000   | 21.84% | 03 Months | January 11, 2024  | 1,097,925  | 2,087,848  | -          | -          |
| 500,000   | 21.84% | 06 Months | January 25, 2024  | 476,069    | 493,163    | -          | -          |
| 1,300,000 | 21.39% | 03 Months | May 2, 2024       | 450,894    | 467,092    | -          | -          |
| 1,000,000 | 21.40% | 03 Months | January 25, 2024  | 1,239,252  | 1,282,644  | -          | -          |
| 1,000,000 | 21.50% | 03 Months | January 25, 2024  | 953,062    | 986,589    | -          | -          |
| 1,500,000 | 21.20% | 06 Months | January 25, 2024  | 952,853    | 986,529    | -          | -          |
| 1,500,000 | 21.30% | 06 Months | May 2, 2024       | 1,356,596  | 1,403,872  | -          | -          |
| 500,000   | 21.29% | 03 Months | May 2, 2024       | 1,355,984  | 1,403,461  | -          | -          |
| 500,000   | 21.46% | 06 Months | February 7, 2024  | 476,914    | 489,708    | -          | -          |
| 1,000,000 | 21.30% | 03 Months | May 16, 2024      | 451,672    | 463,887    | -          | -          |
| 1,700,000 | 21.40% | 06 Months | February 7, 2024  | 953,802    | 979,406    | -          | -          |
| 500,000   | 21.34% | 03 Months | May 16, 2024      | 1,536,089  | 1,577,517  | -          | -          |
| 500,000   | 21.33% | 06 Months | February 22, 2024 | 476,595    | 485,511    | -          | -          |
| 1,100,000 | 21.10% | 03 Months | May 30, 2024      | 451,941    | 480,391    | -          | -          |
| 2,000,000 | 21.10% | 06 Months | February 22, 2024 | 1,049,059  | 1,068,465  | -          | -          |
| 2,000,000 | 21.15% | 06 Months | May 30, 2024      | 1,809,610  | 1,843,085  | -          | -          |
| 500,000   | 21.36% | 03 Months | May 30, 2024      | 1,809,202  | 1,842,749  | -          | -          |
| 500,000   | 21.36% | 06 Months | March 21, 2024    | 476,574    | 477,690    | -          | -          |
| 500,000   | 21.36% | 06 Months | June 27, 2024     | 451,882    | 452,939    | -          | -          |
| Total     |        |           |                   | 37,790,827 | 40,071,538 | 21,820,763 | 22,427,263 |

16/11

11- LOANS AND OTHER RECEIVABLES

|   | Note | 2023                     | 2022             |
|---|------|--------------------------|------------------|
|   |      | -----Rupees in '000----- |                  |
| Rent receivable   |      | 129,570                  | 95,445           |
| Accrued investment income                               |      | 387,709                  | 851,889          |
| Advance against purchase of land and stamp duty         | 11.1 | 3,373                    | 3,373            |
| Advance to employees                                    |      | 15,266                   | 15,492           |
| Other advances  |      | 407,767                  | 248,411          |
| Loans to employees                                      | 11.2 | 68,422                   | 50,959           |
| Less: provision for impairment of loans and receivables | 11.3 | (11,795)                 | (11,795)         |
| Other receivable  |      | 404,889                  | 494,446          |
| Security deposit  |      | 71,790                   | 65,822           |
| Sindh sales   | 11.4 | 1,240,237                | 1,213,877        |
|   |      | <u>2,717,227</u>         | <u>3,027,918</u> |

11.1 In March 2010 as per the approval of the then Board of Directors, NICL purchased 803 kanals of land from M/s. Privilege Farms (Private) Limited situated at Mauna Toor Waraich, Tehsil Cantt., District Lahore to launch a housing scheme for its employees. The pre-requisite for bidding was that only that owner of land could participate in bidding who is owner of hundred percent of required land and certain areas were specified where land was required. Five different companies, including Privilege Farms (Private) Limited, participated in the said bidding. The rates and location offered by the rest of the four companies were apparently favourable for NICL but despite that all the said four companies were technically knocked out and were disqualified and bid of Privilege Farms (Private) Limited was accepted. This is despite the fact that the said Privilege Farms (Private) Limited was not owner of 803 kanals of this land which was a pre-requisite to participate in the said bidding. The land measuring 699 kanals was owned by the family members of accused Mr. Habibullah Wariach whereas 104 kanals of land was purchased from one Mr. Khinar Hamat's family through accused Mr. Akram Warraich being the general attorney. The said land was sold to NICL at Rs. 2,100,000 per Kanal and the said company had purchased 104 kanals of land which was adjoining to the said 699 kanals of land of Mr. Habibullah Wariach family at a very low rate of Rs. 200,000 per Kanal in the same year that is the year 2010. The entire amount of Rs. 1,686,300,000 was paid to Privilege Farms (Private) Limited without registering the sale deed, mutation and possession in favor of NICL.

The legal counsel of the petitioner Mr. Habibullah Waraich contended that the petitioner has no concern whatsoever with the affairs of Privilege Farms (Private) Limited, he has been implicated in this case for the reason that his real son, co-accused Mr. Mohsin Waraich, was managing director of the Privilege Farms (Private) Limited and that no portion of the sale proceed of the land sold to NICL was credited into the account of the petitioner. However, an amount of Rs. 447,854,462 was transferred into joint account of the petitioner and Mr. Mohsin Waraich, wherefrom, the petitioner withdrew an amount of Rs. 197,262,500. However, both the learned standing council, under instruction from the investigating officer, stated that except this transaction, there is no other evidence against the petitioner. It has been confirmed by the learned officer that the entire sale proceed received by Privilege Farms (Private) Limited from NICL has been reimbursed / credited into the account of NICL.

Privilege Farms (Private) Limited offered to return entire amount of sale proceeds to NICL after cancellation of the deal, which was accepted by NICL. Initially, an amount of Rs. 13,300,000 was received during the last year. As on December 31, 2010 remaining amount Rs. 1,673,000,000 plus stamp duty of Rs. 33,726,000 (recoverable from Punjab Revenue Board) aggregating Rs. 1,706,726,000. The recoverable amount from Privilege Farms (Private) Limited amounting to Rs. 1,673,000,000 has been received by NICL upto balance sheet date. Resultantly, entire amount of Rs. 1,686,300,000 paid to Privilege Farms (Private) Limited is recovered in total upto balance sheet date.

Integrity Pact was signed before purchasing the above property under PPRA rules. Its application however is subject to decision of the trial court.

This represents the stamp duty of Rs. 33,726,000 which was recoverable from Punjab Revenue Board in relation to the purchased 803 kanals of land from M/s. Privilege Farms (Private) Limited situated at Mauna Toor Waraich, Tehsil Cantt., District Lahore to launch a housing society for its employees. an amount of Rs 30,353,400 (90%) has been recovered from Punjab revenue board in the year 2015.

11.2 This amount includes current portion of loan to employees amounting to Rs. 10,417,051 (2022: Rs. 16,630,000). And represent mark-up free loan to employees for house rent and automobile loans, and are secured against retirement benefits of respective employees including, where applicable, charge over the assets for which the loans have been given. These loans are recoverable in 36 to 180 equal monthly instalments.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**11.3 Provision for Impairment of loans and receivables:**

|  | 2023                     | 2022   |
|--|--------------------------|--------|
|  | -----Rupees in '000----- |        |
| Provision at the beginning of the year | 11,797                   | 11,797 |
| Charge for the year                    | -                        | -      |
| Provision at the end of the year       | 11,797                   | 11,797 |

- 11.4** The Sindh Revenue Board (SRB) has forcibly recovered an amount of Rs. 1,014,150,868/- from the bank account of National Insurance Company Limited (NICL) maintained with Habib Bank Limited on June 04, 2018. This recovery pertains to Sindh Sales Tax on Services, as assessed and adjusted by the Assistant Commissioner, Unit 10, under Order-in-Original No. 583 of 2018 dated June 2, 2018. The SRB exercised its authority under Section 66(1)(b) and (c) of the Sindh Sales Tax on Services Act, 2011, in executing this recovery. The recovery has been made on the basis of discrepancy of Rs. 4.1 billion has been assessed by the Assistant Commissioner between services provided by NICL and the services received by various entities, including M/s PNSC, M/s OGDCL, M/s CAAP, M/s PTV, and M/s FWBL for the tax periods from 2011 to 2018. The recovered amount includes principal tax, a penalty, and a default surcharge.

|                   | Rupees in '000 |
|-------------------|----------------|
| Principal Tax     | 648,197        |
| Penalty           | 32,410         |
| Default Surcharge | 333,544        |
| Total             | 1,014,151      |

On June 20, 2018, NICL has filed the appeal under section 57 of the Sindh Sales Tax on Services Act, 2011 through Tax Consultant (i.e., Grant Thornton Anjum Rehman) against the Order-in-Original No. 583 of 2018 dated June 2, 2018 before the Commissioner Sindh Revenue Board Karachi to Set-aside, cancel or annul the impugned order being illegal, ultra vires and contrary to the law. The grounds of appeal are as follows.

The learned Assistant Commissioner:

- failed to understand that as per article 165 of The Constitution of the Islamic Republic of Pakistan, indirect tax cannot be levied on the Federal Government or Provincial Government owned entities;
- erred to issue the show cause notice related to tax periods prior to April 30, 2013 as it is time barred under section 23 of the Sindh sales Tax on Services Act 2011;
- erred to mutually invoke section 23(1) and 23(1A) of the Act, despite the fact that appellant had already file its Sindh sales tax return for all the tax periods as mentioned in the show cause notice;
- erred to pass order in haste without providing sufficient and proper opportunity of being heard and submission of reconciliation where required as reconciliation pertained to five different companies and includes 84 tax periods;
- erred to not to consider company's reply submitted vide letter reference T-1432/2018 dated June 01, 2018;
- erred to levy Sindh sales tax without appreciating the fact that the company is also providing insurance services from the provinces other than Sindh to aforesaid companies hence, applicability/chargeability of Sindh sales tax does not arise as it is outside jurisdiction of province of Sindh;
- erred to levy Sindh sales tax on amount that department contends that appellant has received from FWBL. However, the appellant has not provided any insurance services to FWBL;
- erred to without appreciating the fact that the company has deposited the correct and complete amount of Sindh sales tax on services provided to PNSC in the government treasury;
- erred to not to restrict levy of tax only on insurance premium in accordance with Rule 31 of the Sindh Sales Tax on Services Rules, 2011; and
- erred to levy penalty without appreciating absence of 'men's rea' on the part of the appellant and without appreciating the fact that appellant has claimed only allowable input tax.

In addition to the appeal under section 57 of the Sindh Sales Tax on Services Act, 2011 before the Commissioner Sindh Revenue Board Karachi, NICL also filed a Constitutional Petition bearing CP No. D-4454 of 2018 against SRB before the High Court of Sindh at Karachi, which was clubbed with other similar petitions against SRB and decided vide order dated January 31, 2020, with direction to appear before the relevant forum to seek remedy.

The appeal against Order-in-Original No. 583 of 2018 is outstanding before the Commissioner (Appeals), SRB, Karachi, which has been transferred to the Appellate Tribunal, Sindh Revenue Board for adjudication in accordance with the provision of section 59 (7) of the Sindh Sales Tax on Services Act, 2011. The urgent hearing application has been made to the Appellate Tribunal, SRB.

The matter involves the factual reconciliation of the balances as per NICL and its customers primarily including OGDCL and PNSC. The reconciliation exercise has been carried out from time to time before various Commissioner Appeals, SRB and bulk of the data under instruction of the then Commissioner Appeals had already been submitted to the SRB through various letters. Since the Company has the underlying policy wise record duly matched with the amount reflected in its sales tax returns, the Tax Consultant believe that the company has the strong case and ultimate outcome is expected in the Company's favour.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**12 INSURANCE / REINSURANCE RECEIVABLES**

**Unsecured and considered good**

Due from Insurance contract holders  
Less: Provision for impairment of receivables from  
Insurance contract holders  
Due from reinsurers  
Less: Provision for impairment of due from other  
insurers / reinsurers

| 2023                     | 2022       |
|--------------------------|------------|
| -----Rupees in '000----- |            |
| 13,216,608               | 16,205,229 |
| (1,191,048)              | (6,048)    |
| -                        | -          |
| -                        | -          |
| 12,025,560               | 16,199,181 |

- 12.1 Provision of Rs. 1.185 billion against unidentifiable/untraceable receivable under the head of "Insurance / Reinsurance Receivables" has been made after the approval of the Board in 134th Board Meeting held on 26th February 2025.

**13 DEFERRED TAXATION**

**Deferred tax debits arising in respect of:**

Insurance / Reinsurance receivables  
Investment  
Fixed Assets and Intangible  
Retirement Benefit Obligation

|             |             |
|-------------|-------------|
| (464,509)   | (1,754)     |
| 1,312,046   | -           |
| 8,732       | (18,546)    |
| (2,673,042) | (1,944,613) |
| (1,816,773) | (1,964,913) |
| -           | -           |
| (1,816,773) | (1,964,913) |

**Deferred tax credits arising in respect of:**

- 13.1 During the period the amount of deferred tax asset estimated by the company is Rs. 1,816.773 million. The company has not recorded deferred tax asset in the current year on prudence basis.

**14 TAXATION - PAYMENT LESS PROVISIONS**

**Income tax - advance at beginning of the year**

Quarterly Instalments  
Government Securities  
Bank Profit  
Rental Income  
Utility Bills  
Banking transactions  
Miscellaneous

|             |             |
|-------------|-------------|
| 2,998,857   | 2,428,011   |
| 2,316,392   | 1,478,248   |
| 1,518,715   | 1,262,706   |
| 76,927      | 43,825      |
| 60,383      | 62,419      |
| 12,543      | 4,353       |
| -           | -           |
| 80,284      | 105,726     |
| 4,065,244   | 2,957,277   |
| (3,836,868) | (2,704,969) |
| (370,878)   | 318,538     |
| 2,856,355   | 2,998,857   |

**Income tax paid during the year**

Provision for taxation recognized in profit and loss  
account

Provision for taxation recognized in statement of  
comprehensive income

**Income tax - advance at end of the period**

**15 PREPAYMENTS**

Prepaid reinsurance premium ceded  
Prepaid miscellaneous expenses

|            |           |
|------------|-----------|
| 11,162,718 | 9,335,745 |
| 27,753     | 13,036    |
| 11,190,472 | 9,348,781 |

**16 CASH & BANK**

**Cash at bank**

- Current account  
- Savings account

|            |           |
|------------|-----------|
| (383,019)  | 2,838,635 |
| 10,898,131 | 2,149,535 |
| 10,515,112 | 4,988,170 |

- 16.1 These include an amount of Rs. 1.20 million (2022: Rs. 1.20 million) in respect of guarantee against any damage to Sui Southern Gas Company's pipeline. This amount has been deposited with Habib Bank Limited - FTC Branch, Karachi and can not be utilized by the Company, as it must be kept as minimum balance in the respective bank account.
- 16.2 This includes foreign currency accounts having balance of Rs. 4,645,321.97 million (2022 : Rs. 2,746,319.4 million).
- 16.3 This includes profit rates for savings accounts 20.50% to 21.55%.
- 16.4 This profit rate for foreign currency accounts 4.5%.
- 16.5 The negative balance in current account represents outstanding cheques issued but not yet presented as of year-end.

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NATIONAL INSURANCE COMPANY LIMITED  
NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS  
FOR THE YEAR ENDED DECEMBER 31, 2023

17 SHARE CAPITAL

17.1 Authorized Capital

| 2023             | 2022        |
|------------------|-------------|
| Number of Shares |             |
| 600,000,000      | 600,000,000 |

Note

| 2023                     | 2022      |
|--------------------------|-----------|
| -----Rupees in '000----- |           |
| 6,000,000                | 6,000,000 |

17.2 Issued, subscribed and paid-up share capital

| 2023             | 2022        |
|------------------|-------------|
| Number of Shares |             |
| 200,000,000      | 200,000,000 |

17.3

| 2023                     | 2022      |
|--------------------------|-----------|
| -----Rupees in '000----- |           |
| 2,000,000                | 2,000,000 |

17.3 These were issued against net assets at the time of conversion of corporation to limited liability company.

18 RESERVES

Note

Capital reserves  
Reserve for exceptional loss  
Revenue reserves  
General reserve

| 2023                     | 2022       |
|--------------------------|------------|
| -----Rupees in '000----- |            |
| 6,100,000                | 6,100,000  |
| 6,500,000                | 6,500,000  |
| 12,600,000               | 12,600,000 |

19 INSURANCE / REINSURANCE PAYABLES

Due to other insurers / reinsurers

|           |            |
|-----------|------------|
| 9,143,088 | 11,487,252 |
| 9,143,088 | 11,487,252 |

20 OTHER CREDITORS AND ACCRUALS

Accrued expenses  
Salaries Payable  
Bonus Payable  
Unearned rental income  
Security deposits payable  
Federal insurance fee payable  
Retention money  
Stamp duty payable  
Provision for legal contingencies  
Sales Tax Payable  
Others

20.2

|           |           |
|-----------|-----------|
| 153,022   | 35,417    |
| 122,560   | 112,345   |
| 510,810   | 296,043   |
| (2,559)   | 12,002    |
| 19,098    | 14,781    |
| 295,927   | 303,228   |
| 7,591     | 7,591     |
| 17,002    | 17,002    |
| 15,162    | 15,162    |
| 2,498,063 | 2,794,068 |
| 557,987   | 393,832   |
| 4,194,662 | 4,001,470 |

20.1 Bifurcation of Security Deposit:

Utilizable Security Deposit  
Non-utilizable Security Deposit

|        |       |
|--------|-------|
| 19,098 | 9,546 |
| -      | -     |
| 19,098 | 9,546 |

20.1.1 During the year, the Company utilized Rs. 7.409 Million for the purpose of the business from the security deposit in accordance with requirements of written agreements, in terms of section 217 of the Companies Act, 2017

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**20.2 Status of provision for legal contingencies**

**20.2.1 Suit No. 203 of 1990**

NICL has executed a performance bond guarantee for Rs. 13.559 million in favour of WAPDA on behalf of M/S. National Construction Company (Pakistan) Limited (NCC) for the construction of "Remodeling of Distributary System of Lower Swat Canal- Mardan Scrap". NCC has defaulted in the performance of its obligations under the contract and accordingly WAPDA has filed suit against NICL for recovery of the said amount of Rs.13.599 million. The case is still pending before the High Court of Sindh, Karachi.

**20.2.2 HCA No. 203 of 2002**

Insurance claim of KESC was repudiated by NICL. Suit for recovery of Rs.1.60 million filed by KESC was decreed against NICL. NICL has filed appeal before Division Bench, which is pending for Regular Hearing.

**20.3** This represents dividend payable to NICL Employees' Empowerment Trust (NEET) related to 2012, 2013 and 2014. The payment of dividend has been withheld since the Government of Pakistan (the GOP) is considering to revamp Benazir Employees' Stock Option Scheme (BESOS) as communicated to the Company by the Privatization Commission of Pakistan (the PCP). Further, the PCP vide Letter No. 9 (15)/Admn/PC/09 dated January 09, 2013 has informed the Company that all activities regarding BESOS shall be withheld till decision is made by the GoP. On 8 April 2019 Ministry of finance has proposed winding up of BESOS scheme as it is creating extra burden on national exchequer, but the final decision regarding the matter is still pending in the supreme court of Pakistan. On 9 April 2019 on summary sent by the Ministry of Finance, the Cabinet has given go ahead to wind-up BESOS by reverting the shares kept in trust to the President of Pakistan, with the condition that in case any order by the apex court to the contrary in the pending litigation, the Finance Division shall recoup the funds under the relevant head. The main reason for winding-up decision was that the scheme is creating extra burden on national exchequer and not sustainable."

**21 RETIREMENT BENEFIT OBLIGATIONS**

**21.1 Defined benefit plans**

|                                   | 2023                     | 2022             |
|-----------------------------------|--------------------------|------------------|
|                                   | -----Rupees in '000----- |                  |
| -Pension fund                     | 3,415,628                | 2,984,505        |
| -Post Retirement Medical benefits | 2,242,084                | 2,603,662        |
| -Gratuity Scheme                  | 1,132,654                | 695,869          |
| -Compensated absences             | 63,588                   | 43,366           |
|                                   | <u>6,853,955</u>         | <u>6,327,403</u> |

**21.1.1 General description of Defined benefit plans**

The benefits under the defined benefit plans are payable to the employees as follows:

**a Pension scheme**

- In case of retirement at the age of 60, pension is payable to employees who have completed a minimum of 10 years of qualifying service with the NICL. However, gratuity may be granted in the case of an employee who has not completed service of 10 years. The rate of pension is 2% of gross pension of each year extra service beyond 30 years of service subject to maximum of 10%.
- In case of death in service, widow is entitled to 75% of the gross pension. In addition, a lump sum amount of Pension in lieu of 75% of gross pension is paid. This family pension entitlement is subject to a minimum service requirement of 10 years. In case of death or remarriage of the widow, the pension amount shall be paid to the family members until they attain the age of 21 years in case of males and till marriage in case of females.
- In case of death of a pensioner, 75% of the net or gross amount of pension, which the deceased pensioner was in receipt of, shall be admissible to the family of deceased pensioner.

**b Post retirement medical benefits**

- Post-retirement medical facility to an employee shall be allowed in the following events:
  - Retirement
  - Death/ disability during or after services
  - Early retirement from service
- There is a requirement that the pensioner has to render 25 years of service to be entitled to the facility. However, this is not applied in practice.
- The eligible retiree and their spouse are entitled to the medical facility upto the life of the retiree.
- The eligible retirees and their spouse are entitled to reimbursement of all medical expense, including inpatient and outpatient, from hospitals, clinics, doctors etc. on NICL's panel.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**c Gratuity**

- Gratuity is payable under the scheme to employees on cessation of employment on the grounds of death, retirement and resignation. Normal retirement age is 60 years.
- No benefits under Gratuity Scheme are available to any employee who is dismissed / terminated from the service of NICL for misconduct, disobedience or violation of any existing rules and regulations of NICL.
- No benefits under Gratuity Scheme are available to any employee who is dismissed / terminated from the service of NICL for misconduct, disobedience or violation of any existing rules and regulations of NICL.
- One month Gross salary for each completed year of service will be awarded if length of service is greater or equal to 1 year.

**d Compensated absences**

- An employee will be entitled to encash the accumulated earned leave subject to a maximum of 180 days or take Leave Preparatory to Retirement (LPR) subject to a maximum of 360 days at the time of leaving Company service.

All the Regular Employees of National Insurance Company Limited are entitled to take the following types of leaves every year:

- - Leave on average pay;
  - Leave on half average pay;
  - Extraordinary leave;
  - Examination and study leave;
  - Maternity leave;
  - Casual leave.
- These leaves (except casual leave) can be accumulated.

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|   | Pension Fund |             | Post-Retirement Medical Scheme |           | Gratuity Scheme |          | Compensated Absences |          | Total       |             |
|---|--------------|-------------|--------------------------------|-----------|-----------------|----------|----------------------|----------|-------------|-------------|
|   | 2023         | 2022        | 2023                           | 2022      | 2023            | 2022     | 2023                 | 2022     | 2023        | 2022        |
| Rupees in '000  |              |             |                                |           |                 |          |                      |          |             |             |
| <b>21.2 Balance Sheet Reconciliation</b>                |              |             |                                |           |                 |          |                      |          |             |             |
| Present value of defined benefit obligations            | 6,204,456    | 4,993,564   | 2,242,084                      | 2,603,662 | 1,132,654       | 695,869  | 63,588               | 43,366   | 9,642,783   | 8,336,464   |
| Fair value of plan assets                               | (2,788,828)  | (2,009,060) | -                              | -         | -               | -        | -                    | -        | (2,788,828) | (2,009,060) |
| Unrecognised net actuarial loss / (gain)                | 3,415,628    | 2,984,505   | 2,242,084                      | 2,603,662 | 1,132,654       | 695,869  | 63,588               | 43,366   | 6,853,955   | 6,327,405   |
| Recognised liability                                    | 3,415,628    | 2,984,505   | 2,242,084                      | 2,603,662 | 1,132,654       | 695,869  | 63,588               | 43,366   | 6,853,955   | 6,327,405   |
| <b>21.3 Movement in the defined benefit obligations</b> |              |             |                                |           |                 |          |                      |          |             |             |
| Obligation as at January 1                              | 4,993,564    | 4,360,282   | 2,603,662                      | 2,182,013 | 695,869         | 602,452  | 43,366               | 63,134   | 8,336,462   | 7,207,880   |
| Service cost  | 24,350       | 22,014      | 115,642                        | 100,981   | 60,776          | 57,003   | 1,495                | 1,725    | 202,263     | 181,723     |
| Past Service Cost                                       | -            | -           | -                              | -         | -               | -        | -                    | -        | -           | -           |
| Interest cost   | 686,609      | 510,180     | 369,156                        | 263,751   | 98,812          | 73,768   | 5,861                | 7,460    | 1,160,438   | 855,159     |
| Settlement and Curtailment                              | -            | -           | -                              | -         | -               | -        | -                    | -        | -           | -           |
| Actuarial Losses / (gains)                              | 850,446      | 492,191     | (820,268)                      | 114,762   | 282,080         | (36,832) | 24,223               | (17,595) | 336,480     | 552,526     |
| Benefits paid   | (350,513)    | (391,103)   | (26,108)                       | (57,844)  | (4,883)         | (521)    | (11,357)             | (11,357) | (392,860)   | (460,826)   |
| Obligation as at December 31                            | 6,204,456    | 4,993,564   | 2,242,084                      | 2,603,662 | 1,132,654       | 695,869  | 63,588               | 43,366   | 9,642,783   | 8,336,462   |
| <b>21.4 Movement in the fair value of plan assets</b>   |              |             |                                |           |                 |          |                      |          |             |             |
| Fair value as at January 1                              | 2,009,060    | 502,179     | -                              | -         | -               | -        | -                    | -        | 2,009,060   | 502,179     |
| Expected return on plan assets                          | 293,754      | 148,080     | -                              | -         | -               | -        | -                    | -        | 293,754     | 148,080     |
| Actuarial gains / (Losses)                              | 381,271      | (54,485)    | -                              | -         | -               | -        | -                    | -        | 381,271     | (54,485)    |
| Employer contributions                                  | 455,256      | 1,804,389   | -                              | -         | -               | -        | -                    | -        | 455,256     | 1,804,389   |
| Benefits paid   | (350,513)    | (391,103)   | -                              | -         | -               | -        | -                    | -        | (350,513)   | (391,103)   |
| Fair value as at December 31                            | 2,788,828    | 2,009,060   | -                              | -         | -               | -        | -                    | -        | 2,788,828   | 2,009,060   |
| <b>21.5 Cost</b>  |              |             |                                |           |                 |          |                      |          |             |             |
| Current service cost                                    | 24,350       | 22,014      | 115,642                        | 100,981   | 60,776          | 57,003   | 1,495                | 1,725    | 202,263     | 181,723     |
| Interest cost   | 686,609      | 510,180     | 369,156                        | 263,751   | 98,812          | 73,768   | 5,861                | 7,460    | 1,160,438   | 855,159     |
| Expected return on plan assets                          | (293,754)    | (148,080)   | -                              | -         | -               | -        | -                    | -        | (293,754)   | (148,080)   |
| Past service cost                                       | -            | -           | -                              | -         | -               | -        | -                    | -        | -           | -           |
| Recognition of actuarial loss or (Gain)                 | 469,175      | 546,676     | (820,268)                      | 114,762   | 282,080         | (36,832) | 24,223               | (17,595) | (59,014)    | 624,606     |
| Re-measurements of other long term benefits             | -            | -           | -                              | -         | -               | -        | -                    | -        | -           | -           |
| Expense   | 886,380      | 930,790     | (335,471)                      | 479,494   | 441,668         | 93,939   | 31,579               | (8,410)  | 1,024,156   | 1,495,812   |
| <b>21.6 Actual return on plan assets</b>                | 675,025      | 93,595      | -                              | -         | -               | -        | -                    | -        | 675,025     | 93,595      |

**21.7 Principal actuarial assumptions used are as follows:**

|  | Pension Fund |              | Post-Retirement Medical Scheme |       | Gratuity Scheme |       | Compensated Absences |        |
|--|--------------|--------------|--------------------------------|-------|-----------------|-------|----------------------|--------|
|  | 2023         | 2022         | 2023                           | 2022  | 2023            | 2022  | 2023                 | 2022   |
| Discount rate & expected return on plan assets | 10.25%       | 11.75%       | 10.25%                         | 11.8% | 10.25%          | 11.8% | 10.25%               | 11.75% |
| Future salary increases                        | 10.25%       | 11.75%       | -                              | -     | 10.25%          | 11.8% | 10.25%               | 11.75% |
| Future pension increases                       | 8.25%        | 8%           | -                              | -     | -               | -     | -                    | -      |
| Medical cost trend rates                       | -            | -            | 10.25%                         | 11.8% | -               | -     | -                    | -      |
| Net Retirement age                             | 60           | 60           | -                              | -     | -               | -     | -                    | -      |
| Mortality Rates                                | SLIC 2001-05 | SLIC 2001-05 | -                              | -     | -               | -     | -                    | -      |

**21.8 Comparison for five years:**

**As at December 31**

Present value of defined benefit obligation  
Fair value of plan assets  
Deficit / (surplus)

**As at December 31**

Present value of defined benefit obligation  
Fair value of plan assets  
Deficit / (surplus)

**As at December 31**

Present value of defined benefit obligation  
Fair value of plan assets  
Deficit / (surplus)

**As at December 31**

Present value of defined benefit obligation  
Fair value of plan assets  
Deficit / (surplus)

| Pension Fund                   |             |           |           |           |
|--------------------------------|-------------|-----------|-----------|-----------|
| 2023                           | 2022        | 2021      | 2020      | 2019      |
| Rupees in '000                 |             |           |           |           |
| 6,204,456                      | 4,993,564   | 4,360,282 | 3,481,063 | 3,297,584 |
| (2,788,828)                    | (2,009,060) | (502,179) | (39,668)  | (30,107)  |
| 3,415,628                      | 2,984,505   | 3,858,104 | 3,441,395 | 3,267,477 |
| Post Retirement Medical Scheme |             |           |           |           |
| 2023                           | 2022        | 2021      | 2020      | 2019      |
| Rupees in '000                 |             |           |           |           |
| 2,242,084                      | 2,603,662   | 2,143,016 | 2,243,178 | 1,203,252 |
| -                              | -           | -         | -         | -         |
| 2,242,084                      | 2,603,662   | 2,143,016 | 2,243,178 | 1,203,252 |
| Gratuity Scheme                |             |           |           |           |
| 2023                           | 2022        | 2021      | 2020      | 2019      |
| Rupees in '000                 |             |           |           |           |
| 1,132,654                      | 695,869     | 602,311   | 275,084   | 203,855   |
| -                              | -           | -         | -         | -         |
| 1,132,654                      | 695,869     | 602,311   | 275,084   | 203,855   |
| Compensated Absences           |             |           |           |           |
| 2023                           | 2022        | 2021      | 2020      | 2019      |
| Rupees in '000                 |             |           |           |           |
| 63,588                         | 43,366      | 63,134    | 22,265    | 34,711    |
| -                              | -           | -         | -         | -         |
| 63,588                         | 43,366      | 63,134    | 22,265    | 34,711    |

Bsn

21.9 Experience adjustments

(Gain) / loss on obligations (as percentage of plan obligations)  
Gain/(loss) on plan assets (as percentage of plan assets)

(Gain) / loss on obligations (as percentage of plan obligations)  
Gain/(loss) on plan assets (as percentage of plan assets)

(Gain) / loss on obligations (as percentage of plan obligations)  
Gain/(loss) on plan assets (as percentage of plan assets)

(Gain) / loss on obligations (as percentage of plan obligations)  
Gain/(loss) on plan assets (as percentage of plan assets)

21.10 Plan assets comprise of the following:

Equity  
Debt  
Cash at bank  
Fair value of plan Assets

21.11 Sensitivity analysis, the impact of 1% change in following variables on defined benefit obligation is as follows:

+1% Discount Rate  
-1% Discount Rate  
+1% Salary Increase Rate  
-1% Salary Increase Rate  
+1% Medical Cost Increase Rate  
-1% Medical Cost Increase Rate  
+1% Pension Increase Rate  
-1% Pension Increase Rate  
1Year mortality Setback  
1Year mortality Set Forward

+1% Discount Rate  
-1% Discount Rate  
+1% Salary Increase Rate  
-1% Salary Increase Rate  
+1% Medical Cost Increase Rate  
-1% Medical Cost Increase Rate  
+1% Pension Increase Rate  
-1% Pension Increase Rate  
1Year mortality Setback  
1Year mortality Set Forward

| Pension Fund |      |      |      |      |
|--------------|------|------|------|------|
| 2023         | 2022 | 2021 | 2020 | 2019 |
| 25%          | -1%  | 1%   | 1%   | 0%   |
| 14%          | -5%  | 3%   | 5%   | -25% |

| Post Retirement Medical Scheme |      |       |       |       |
|--------------------------------|------|-------|-------|-------|
| 2023                           | 2022 | 2021  | 2020  | 2019  |
| -35.6%                         | 4.4% | -7.9% | -8.5% | 25.7% |
| 0%                             | 0%   | 0%    | 0%    | 0%    |

| Gratuity Scheme |      |      |      |      |
|-----------------|------|------|------|------|
| 2023            | 2022 | 2021 | 2020 | 2019 |
| 25%             | -5%  | -6%  | 9%   | -1%  |
| 0%              | 0%   | 0%   | 0%   | 0%   |

| Compensated Absences |      |      |      |      |
|----------------------|------|------|------|------|
| 2023                 | 2022 | 2021 | 2020 | 2019 |
| 38%                  | -41% | -10% | -35% | -25% |
| 0%                   | 0%   | 0%   | 0%   | 0%   |

| 2023            |      | 2022            |     |
|-----------------|------|-----------------|-----|
| Rupees in '000' | %    | Rupees in '000' | %   |
| 2,760,000       | 99%  | 418,456         | 83% |
| 28,829          | 1%   | 83,724          | 17% |
| 2,788,829       | 100% | 502,180         | -   |

| 2023            |                  |           |                      |            |
|-----------------|------------------|-----------|----------------------|------------|
| Pension         | Medical benefits | Gratuity  | Compensated absences | Total      |
| Rupees in '000' |                  |           |                      |            |
| 5,673,323       | 2,006,568        | 1,013,664 | 61,942               | 8,755,497  |
| 6,831,490       | 2,500,824        | 1,274,841 | 72,983               | 10,680,138 |
| 6,234,471       | -                | 1,274,524 | 72,904               | 7,581,899  |
| 5,175,665       | -                | 1,011,492 | 61,925               | 7,249,082  |
| -               | 2,525,686        | -         | -                    | 2,525,686  |
| -               | 2,000,253        | -         | -                    | 2,000,253  |
| 6,837,139       | -                | -         | -                    | 6,837,139  |
| 5,660,319       | -                | -         | -                    | 5,660,319  |
| 6,368,449       | -                | -         | -                    | 6,368,449  |
| 6,040,589       | -                | -         | -                    | 6,040,589  |
| 49,821,445      | 9,033,331        | 4,574,521 | 269,754              | 63,699,051 |

| 2022            |                  |           |                      |            |
|-----------------|------------------|-----------|----------------------|------------|
| Pension         | Medical benefits | Gratuity  | Compensated absences | Total      |
| Rupees in '000' |                  |           |                      |            |
| 3,571,111       | 1,942,449        | 374,519   | 63,136               | 6,351,215  |
| 4,820,552       | 2,468,125        | 492,798   | 56,727               | 7,838,200  |
| 4,392,380       | -                | 492,724   | 70,726               | 4,955,830  |
| 4,329,643       | -                | 374,357   | 56,667               | 4,760,667  |
| -               | 2,471,363        | -         | -                    | 2,471,363  |
| -               | 1,935,681        | -         | -                    | 1,935,681  |
| 4,612,389       | -                | -         | -                    | 4,612,389  |
| 3,971,215       | -                | -         | -                    | 3,971,215  |
| 4,475,501       | -                | -         | -                    | 4,475,501  |
| 4,245,107       | -                | -         | -                    | 4,245,107  |
| 35,017,898      | 8,617,618        | 1,734,396 | 247,256              | 45,617,168 |

Exn

22 CONTINGENCIES AND COMMITMENTS

22.1 Contingencies

- 22.1.1 Claims against the Company not acknowledged as debts amounted to Rs. 344.183 million at year end (2022: Rs.344.183 million). Hence, no provision has been made in these financial statements. Significant claim include claims of Rs. 114 million by Al – Khan Construction (Private) Limited.
- 22.1.2 Habib Bank Limited has issued guarantees on behalf of the Company amounting to Rs. 39.204 million (2022: Rs. 39.204 million) for the above mentioned claims.
- 22.1.3 The Company has issued policies in respect of guarantees against 'Fidelity Guarantee' amounting to Rs. 5.29 million (2022: Rs.240.393 million)
- 22.1.4 Matters related to taxation;
- (i) The Commissioner Inland Revenue CIR(A) has passed the order under section 129 of the Income Tax Ordinance, 2001(the Ordinance) for the tax years 2004, 2006, 2007 and 2008 in which the additions made by the Taxation Officer were deleted. Aggrieved by the order of the Commissioner Inland Revenue (Appeals) the Inland Revenue department had filed an appeal before the Appellate Tribunal Inland Revenue (ATIR). Appeals were thereafter dismissed on account of non-attendance by Department at ATIR. Subsequently department filed rectification applications which have been accepted. Now appeals are to be decided on the grounds raised in the appeals. Appeal for the tax year 2005 is decided in favour of NICL all other appeals are still pending.
  - (ii) The Commissioner Inland Revenue (Appeals) vide order no. 97 dated September14, 2015 vacated the amended order passed by the ACIR vide DC no. 28/48 dated 20/06/2014 on account of barred by time limitation for the tax year 2008. Department preferred appeal before ATIR and the same is still pending.
  - (iii) The Commissioner Inland Revenue (Appeals) vide order no. 4 dated March 28, 2016 vacated the treatment accorded by the ACIR for taxing the dividend income at the normal Corporate rate for the tax year 2009. Department preferred appeal before ATIR and the same is still pending.
  - (iv) For the tax year 2010 against the order passed by the CIR(Appeal) vide order no. 8 dated March 28, 2016, appeal has been filed before the ATIR on the issue of provision for IBNR. Tax department has also filed before ATIR against the order of CIR(A) for vacating the treatment accorded by the ACIR for taxing the dividend income at the normal Corporate rate.
  - (v) For the tax year 2011 against the order passed by the CIR(Appeal) vide order no. 5 dated March 28, 2016 appeal has been filed before the ATIR on the issue of provision for IBNR. Tax department has also filed before ATIR against the order of CIR(A) for vacating the treatment accorded by the ACIR for taxing the dividend income and rental income at the normal Corporate rate.
  - (vi) For the tax year 2012 against the order passed by the CIR(Appeal) vide order no. 6 dated March 28, 2016 tax department has filed appeal before ATIR for vacating the treatment accorded by the ACIR for taxing the dividend income at the normal Corporate rate.
  - (vii) For the tax year 2013 against the order passed by the CIR(Appeal) vide order no. 7 dated March 28, 2016 appeal has been filed before the ATIR on the issue of provision for IBNR. Tax department has also filed before ATIR against the order of CIR(A) for vacating the treatment accorded by the ACIR for taxing the dividend income at the normal Corporate rate.
  - (viii) For the issue of provision for IBNR, no provision for taxation has been made in these financial statements as Honourable High Court of Sindh has already decided the issue in the case of another insurance Company in favour of the taxpayer. Considering that at the ATIR level favourable outcome is expected in the case of the Company.
  - (ix) For the tax year 2014, tax department passed the provisional assessment u/s 122C of the Ordinance as return for the said tax period was not filed by the Company due to non-availability of financial statements. Further, the said provisional assessment shall be treated as final assessment order after the expiry of 45 days from the date of service of order of provisional assessment. Later financial statements audited. On the basis thereof department amended the assessment and enhanced the income on the basis of audited financial statements. Against the tax department treatment Appeal-filed before CIR(A). CIR(A) given favourable order. Against the order of CIR(A) tax department preferred appeal before the ATIR. On the issue of reversal of impairment of investment, reversal in value of investment, tax on dividend income at reduced rate, deletion of addition on account of unrealized exchange gain and amortization of premium. Appeal is pending before ATIR. Considering the history and position of law favourable outcome is expected.
  - (x) For the tax year 2015 tax department passed the provisional assessment u/s 122C of the Ordinance as return for the said tax period was not filed by the Company due to non-availability of financial statements. Further, the said provisional assessment shall be treated as final assessment order after the expiry of 45 days from the date of service of order of provisional assessment. Later financial statements audited. On the basis of audited account income arises less as compare to the provisional assessment. Application u/s 122A filed before the Commissioner Inland Revenue to cancel the provisional assessment. However, Commissioner Inland Revenue rejected the application. Against the Commissioner rejection of application matter may be raised at the High Court level to obtain the desired relief.
  - (xi) For the tax year 2016 tax department passed the provisional assessment u/s 122C of the Ordinance as return for the said tax period was not filed by the Company due to non-availability of financial statements. Further, the said provisional assessment shall be treated as final assessment order after the expiry of 45 days from the date of service of order of provisional assessment.
  - (xii) For the tax year 2017 tax department passed the order u/s 121 of the Ordinance as best judgment as return for the said tax period was not filed by the Company due to non-availability of financial statements by increasing the income thirty percent as compare to the preceding year. Against the order passed appeal filed before CIR(A). CIR(A) remanded the matter back to the DCIR. DCIR repeated the same treatment. Again appeal was filed before CIR(A). CIR(A) as per his order restricted the increased in income to the extent of fifteen percent as compare to the preceding tax year. Against the order of CIR(A) appeal before the ATIR is being filed.

- (xiii) For the tax year 2018 taxpayer filed the return u/s 114 of the Ordinance. The return was filed on the basis of unaudited financial statements. Tax department declared the return invalid filed on the basis of the unaudited financial statements and passed the order u/s 121(1) of the Ordinance. Against the order passed appeal filed before CIR(A). CIR(A) remanded the matter back. Subsequently, the DCIR passed the non-speaking order of appeal effect order passed u/s 124/129 of the Ordinance without complying direction of the CIR(A). The DCIR based his finding on the income of tax year 2017 whereas, same is not in filed after decision of CIR(A) and cross appeals are pending before the Appellate Tribunal Inland Revenue (ATIR). The DCIR in arbitrary manner placed reliance for enhancement of income on the estimate of advance tax for the tax year 2020 which is against the rational as trend is to be followed on historical pattern. Against the above impugned order an appeal has been filed before CIR(A), however the decision is still pending.

For the tax year 2018. The learned ADCIR passed the amended order under section 122(5A) of the Ordinance by treating the reassessment order passed by the DCIR under section 124(4)/129 of the Ordinance as erroneous as well as prejudicial to the interest of revenue. As per ADCIR version increase in income as compared to the preceding year by 20% is not in line with the history and norms of the insurance industry and income should have been increased by 30%. This considered by the ADCIR as erroneous. However, treatment accorded by the ADCIR is arbitrary and against the provisions of law, ratio settled by the superior court and history of the case of the taxpayer. The ADCIR wrongly determined the taxable income on the basis of order passed for the tax year 2017 whereas, such order is not in field and cross appeals are pending before the ATIR. The ADCIR also failed to appreciate the revenue scheme of the insurance business and resorted to arbitrary treatment. The ADCIR also failed to give credit of refund adjustment and full tax credit of tax paid. Against the above impugned order an appeal has been filed before CIR(A), however the

- (xiv) The Company believes that the above matter would be decided favourably. Accordingly, no provision for any tax liability, which may arise in case of adverse decisions, has been made in the financial statements.

#### 22.1.5 Suit No.287/2001 and Suit No.432/2001

Al-Khan Construction(Pvt) Ltd. has been awarded a contract of construction of West Nawab Shah Surface Drainage System Left Bank Outfall vide contract no.10 AB-2, Stage -I by WAPDA while NICL issued Contractor's All Risk insurance policy for this work which covered the risk of rains/flood damages. In July and August 1992 there was rain and flood in the area which caused severe damages to the work done into the area. The claim has been lodged for Rs.114 million. However, the surveyors determined the amount of claim as Rs.2,694,682 which after deductions in accordance with the terms and conditions of the policy amounted to Rs.694,682. Al-Khan Construction has filed two identical cases (Suit No.287/2001 for recovery Rs.48.3 million and Suit No.432/2001 for recovery of Rs.65.7 million) in the Court of Senior Civil Judge, Lahore. The cases have been twice decreed against NICL, First at 26-4-2003 by Civil judge Lahore and second at 24-11-2010 by the judge of insurance tribunal and the higher court has demanded bank guarantee of one third of decree amount and accordingly, Habib Bank Limited has issued guarantees on behalf of the Company amounting to Rs. 39.204 million (2014: Rs. 39.204 million). NICL filed RFA 269/2009 and RFA 270/2003 in Lahore High Court. The above mentioned suits have been transferred before insurance Tribunal vide order dated 28-01-2010 in view of Section 122 (3) of Insurance Ordinance, 2000. These cases were decided against NICL from Insurance Tribunal at Lahore. NICL filed RFA No. 97/2011 and RFA No. 98/2011, before Lahore High Court, which were decided in favour of NICL and cases were remanded back to Civil Court for recording evidence and decision afresh in this matter. Cases are pending for evidence. However, due to non-prosecution, the same was adjourned as sine-die

#### 22.1.6 HCA 313/08 - Suit 694/01 & execution no. 87/2009

It is submitted that NLC filed the Suit No. 694 of 2001 for recovery of Rs. 59,694,773/- against NICL being decreed amount in various third-party claims suits against NLC. The said suit was decreed in favour of NLC to the extent of Rs. 704,000/- vide judgment dated 13.01.2003 by Sindh High Court. Thereafter, the said judgment and decree was amended by the Court vide order dated 08.02.2008 by declaring maximum liability of NICL as Rs. 176,000/- per person under Qisas & Diyat Ordinance 1979. Being aggrieved and dissatisfied with the said decree, NICL filed an Appeal i.e. HCA No. 313 of 2008 before Sindh High Court against NLC. Later, the decree holder M/s NLC filed another misc. application, whereby the maximum liability of NICL was modified from Rs. 176,000/- per person to Rs. 1,550,000/- per person with mark-up @ 15% per annum vide order dated 15.09.2008. At that time the Law Department was Headed by the former General Manager (Law).

#### 22.1.7 Suit No. 2587 of 2016

NICL has filed suit against Karachi Cantonment Board (KCB). It is contended that previously the annual rental value of the property was being increased at the rate of 15% per annum, however, all of sudden for the period w.e.f 01.07.2013 to 30.06.2016 it has been exorbitantly increased @ 350% per annum. The amount for the said increase is approximately 48 million. As per the case details, it was evident that previously, NICL building has been treated as a single unit for the purpose of the House tax and Conservancy tax @ 15% and 2% per annum respectively up to June 30, 2013. However, notice under section 103 of the Cantonment Act, 1924 was served upon the NICL management vide letter No. KCB/189/2/A.S.R/1381 dated November 11, 2012 in which management was asked to disclose details of rented out portions of the NICL. Based on this KCB has assessed arrears of the value of Housing and conservancy tax of Rs.48.4 million for the period from July 2013 to June 2016. The appeal filed by NICL has been dismissed and as per the order dated February 23, 2017 of the Cantonment Board, the said dues have been ordered to be paid to KCB at earliest, NICL has filed Constitutional Petition against KCB in the Sindh High Court at Karachi, whereby NICL has challenged Order dated 23.02.2017 passed by the Directors Military Lands & Cantonment, Karachi Region, Karachi, in a Review Petition No. 15 of 2016. Consequently NIC Building was de-sealed and KCB was restraint from taking coercive action against NICL. Case was fixed for hearing on 24-02-2025 and the same was adjourned as date-in-office without any proceedings due to paucity of time.

24.02.25

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**22.1.8 CP No. 4455 of 2018**

The present petition has been filed pursuant to Show Cause Notice dated 28-03-2018 issued by SRB against NICL, whereby objection regarding tax-ability of the NICL was raised, NICL has challenged the assessment of Sind Sales Tax i.e. Rs. 95,772,945/- on account of insurance service provided to TCP during the tax period of July-2011 to June-2018. NICL has obtained stay order for the above payment. The petition was disposed of vide order dated 31-01-2020 with direction to the parties to pursue to case before the relevant forum.

**22.1.9 CP No. 4456 of 2018**

The present petition has been filed pursuant to Show Cause Notice dated 28-03-2018 issued by SRB against NICL, whereby objection regarding tax-ability of the NICL was raised, NICL has challenged the assessment of Sind Sales Tax i.e. Rs. 370,436,259/- on account of insurance service provided to SSGC and PPL during the tax period of July-2011 to December -2017. NICL has obtained stay order vide order dated 08-06-2018 passed by the Sindh High Court against the above demand of SRB. The case was disposed of vide order dated 31-01-2020 with directions to the parties to pursue the petition before the relevant forum.

**22.1.10 RFA No. 117 of 2017**

M/s. Descon Engineering filed case against NICL before Insurance Tribunal at Lahore for recovery of Rs. 77,368,157/- on account of insurance claim regarding the flood policy obtained from NICL for it Dam construction project. The case was dismissed and decided in favour of NICL vide Order dated 01.02.2017 passed by the Insurance Tribunal Lahore. Being aggrieved M/s. Descon Engineering challenged the said Order dated 01.02.2017 and filed appeal before Lahore High Court, which was dismissed vide order/judgment dated 20-09-2021 and decided in favour of NICL.

The owner of M/s. Raja & Brothers filed a Constitution Petition No. D-554 of 2012 in the High Court of Sindh, Karachi, against FIA and NICL, to seek order regarding release of outstanding amount from NICL, which was stopped under the instructions of FIA. Mr. Israr Ahmed, Additional Director (Law) appeared in the Court and stated that FIA has no objection if outstanding amount released in favour of Petitioner. Petitioner was directed to approach the trial Court for defreezing his amount lying with the NICL which has been freezed under section 5 (5) of the FIA Act. The remaining amount of Rs. 16.275 million has been paid to M/s. Raja & Brothers

**22.1.11 As per note 7 of these financial statements, the amount of Rs. 80,400,000 (recovered form a party) has been adjusted against investment property of Rs. 505,255,000 related to 20 Kanal 2 Marala, after the adjustment the said investment property balance of Rs. 424,855,000 is reflected in theses financial statements. The amount of Rs. 80 million was recovered as per order of the civil court details of which are mentioned in note 7.2.2 of these financial statements.**

Subsequently, on January 02, 2020 the criminal case was disposed of by the Honourable Accountability Court No IV Karachi, where by all accused persons were acquitted. However, the reversal of the above amount has not been made in these financial statements as in the view of the management the order of the Accountability court will not impact the recovery already made.

**22.1.12 Suit No. 571 of 1987**

A consignment of a plant of machinery for manufacture of heavy duty polyethene bags stowed in 4 containers was imported by M/s. Farmaish Industries Limited from Italy. The said consignment was delivered at the port of Karachi on 10-11-1983. Out of 43 packages, 5 packages were missing from the containers in custody of KPT. NICL settled the insurance claim and filed suit for recovery of amount based on letter of subrogation for a recovery of Rs. 8,411,540/-. The said suit was decreed in favour of NICL and against the KPT vide Sindh High Court's order dated 21-02-2006. An appeal was filed by the KPT before the Division Bench of the Sindh High Court (HCA No. 317 of 2006) which was dismissed vide order dated 23-06-2017. Another appeal was filed by the KPT before the Supreme Court of Pakistan, which was also dismissed vide order dated 25.02.2019. NICL has filed Execution No. 64 of 2019 before the Sindh High Court for satisfaction / realization of decreed amount. Up till now NICL has recovered Rs. 8.4 million on account of principle amount and 18 million on account of interest of amount. The said Execution proceeding is still pending for final adjudication, since NICL is of the view that interest of amount of around 42 million. This metter is fixed for hearing on 07-04-2025.

**22.1.13 Suit No. 224 of 2019**

Mengal Brothers Transport (Pvt.) Limited (plaintiff) filed this suit against PSO and NICL for recovery of PKR 3,964,180,144/-. They contended that during supply of fuel, plaintiff suffered losses due to terrorist attacks, in which not only vehicles were destroyed but drivers and cleaners lost their lives or disabled. Plaintiff claimed that PSO agreed to compensate the victims, their families and to pay the loss of accidental vehicles after seeking survey report from NICL. Plaintiff contended that the loss is still unpaid. NICL denied the contention on the ground that there is no privity of contract between the plaintiff and NICL. NICL has submitted that during the contractual period 2002-2012 between PSO and NICL, 463 vehicles were reported to be damaged. NICL compensated PSO for 177 claims through a payment of Rs. 394,109,474/- as per the insurance policy dated 29 May 2002. NICL has denied the assertion that the plaintiff has supplied all relevant documents of the remaining 274 claims. NICL has submitted the documents of 159 outstanding claims through PSO and Surveyors, which were sent to the relevant authorities for verification. Out of 1038 documents only 256 documents were confirmed as genuine. This metter is fixed for hearing on 07-04-2025.

*Handwritten signature*

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**22.1.14 Suit No. 284 of 2019**

NICL has filed suit against PNSC for recovery of PKR 337,485,500/- based on Letter of Subrogation. The Controller of Military Accounts ESD Jhelum enters into a contract with PNSC for shipment of 4 units of Trestle Bridge. The Cargo was insured with NICL under Marine Cargo Insurance Policy dated 28-12-2016. Due to insufficient safety measuring of Shipping Company, the Cargo was damaged. Consequently, based on the survey report NICL paid the loss and filed a suit against the PNSC and Hyundai Glovis Company Ltd. for recovery of the amount based on letter of subrogation. In its reply, the PNSC denied that the shipment of 4 units of trestle bridge is valued at USD 3,325,000/-. It is further submitted that the invoice declaring the value of the units was not produced to them at the time of shipment and nor was the value of the units in question declared in the bill of lading. PNSC has contended that the Insurance Policy does not cover the voyage in question and hence the plaintiff is not entitled to sue in respect of alleged loss. PNSC has denied journey commenced without considering the weather forecast.

NICL and the Hyundai Glovis Company Limited (HGCL) have reached to out of court settlement through a Settlement Agreement in Korea. Accordingly, under Article-1 of the Settlement Agreement, "The Cargo Underwriters shall waive finally and absolutely their claims against PNSC and withdraw the lawsuit against PNSC and Glovis and provide Glovis with a copy of documents proving withdrawal of the lawsuit within fourteen (14) business days following receipt of the sum of USD 314,194.88 into the specified bank account in Article 3 of the agreement. Accordingly, the amount has already been received by NICL.

**22.1.15 Suit No. 14861-C of 2016**

M/s Dr. A.Q. Khan Laboratories Kahota filed this suit against NICL and 05 others, for recovery of US \$ 235,000/-. The plaintiff is a strategic organization procured under the name and style of M/s. Golden Hands Enterprises due to defence and strategic issues. M/s. Golden Hands Enterprises issued a letter to its approved supplier on 03 Feb 2011 for the purchase of 500-ton Aluminium ingots 99.5 purity. After deliberation the contract was assigned to M/s. Allied Cotton Mills (the Defendant No. 1) for supply of 500 M Ton aluminium ingots at the rate of USD 2350 per M Ton. The defendant No. 1 through a letter dated 28 Mar 2011 informed the plaintiff that material has been shipped as per the contract. The shipment documents were basically forged and that ultimately the plaintiff after wasting a lot of time and making huge payment to the defendants received nothing. The insurance claim was repudiated by NICL on the ground that the assured might have suffered a loss but that should have been supported by appropriate proof, facts and supporting documents. On the "Prima Facie" of the circumstances that case appear to a "Maritime Fraud" which is not a listed peril under institute Cargo Clauses, therefore, the loss does not have any merit and is liable to be repudiated. The case is pending for evidence before Civil Court, Lahore in which NICL being the Defendant No. 6 contesting the case while 05 others have been proceeded ex-parte. Case is fixed for hearing on 08-04-2025.

**22.1.16 Suit No. 460 of 1997**

M/s OGDCL required 33 numbers of caravans for using the same at various sites. As a result of the tendering process. M/s. Ravi Engineering Limited was assigned the contract. M/s. Ravi Engineering supplied 08 caravans out of 33 and failed to perform their contractual obligations to the extent of remaining caravans. The suit was filed by OGDCL against M/s. Ravi Engineering and NICL, for recovery of PKR 24,638,098/- which was decreed vide judgment dated 10 Jul 2021. Appeal filed by Ravi Engineering and NICL before the Islamabad High Court were also dismissed. Both M/s. Ravi Engineering Limited and NICL have filed appeals before the Supreme Court of Pakistan, which were fixed for hearing on 03-03-2025, after arguments the same were admitted for regular hearing and notices were issued to respondents.

**22.2 Commitments**

Commitments in respect of capital expenditure as at December 31, 2023 amounted to Rs. nil (2022: Rs. nil).

*As per*

**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

|  | 2023                     | 2022         |
|--|--------------------------|--------------|
|  | -----Rupees in '000----- |              |
| <b>23 NET INSURANCE PREMIUM</b>  |                          |              |
| Written Gross Premium  | 29,741,301               | 24,049,441   |
| Add : Unearned premium reserve opening   | 12,861,254               | 10,495,470   |
| Less : Unearned premium reserve closing  | (15,516,759)             | (12,861,254) |
| Premium earned   | 27,085,796               | 21,683,657   |
| Reinsurance premium ceded  | 23,199,885               | 16,890,877   |
| Add : Prepaid reinsurance premium opening  | 9,335,745                | 7,456,181    |
| Less : Prepaid reinsurance premium closing                                       | (11,162,718)             | (9,335,745)  |
| Reinsurance expense  | 21,372,912               | 15,011,313   |
|  | 5,712,885                | 6,672,344    |
| <b>24 NET INSURANCE CLAIMS</b>   |                          |              |
| Claim Paid   | 3,597,484                | 2,362,247    |
| Add : Outstanding claims including IBNR closing                                  | 47,490,353               | 42,193,872   |
| Currency Translation Effect  | (2,977,537)              | (424,494)    |
| Less : Outstanding claims including IBNR Opening                                 | (42,193,872)             | (14,575,836) |
| Claims expense   | 5,916,428                | 29,555,790   |
| Less : Reinsurance and other recoveries received                                 | 2,636,712                | 1,527,494    |
| Add : Reinsurance and other recoveries in respect of outstanding claims closing  | 40,492,438               | 35,621,925   |
| Currency Translation Effect  | (2,646,551)              | (492,156)    |
| Less : Reinsurance and other recoveries in respect of outstanding claims opening | (35,621,925)             | (8,911,760)  |
| Reinsurance and other recoveries revenue   | 4,860,674                | 27,745,503   |
|  | 1,055,753                | 1,810,286    |
| <b>25 NET COMMISSION AND OTHER ACQUISITION COSTS</b>                             |                          |              |
| Commission paid or payable   | 7,669                    | 888          |
| Add: Deferred commission expense opening   | 8,730                    | -            |
| Less: Deferred commission expense closing  | (3,257)                  | 8,730        |
| Net Commission   | 13,142                   | 9,618        |
| Less: Commission received or recoverable   | 824,378                  | 672,060      |
| Add: Unearned Reinsurance Commission opening                                     | 338,511                  | 228,954      |
| Less: Unearned Reinsurance Commission closing                                    | (371,729)                | (338,511)    |
| Commission from reinsurers   | 791,160                  | 562,503      |
|  | 778,018                  | 552,884      |
| <b>26 MANAGEMENT EXPENSES</b>  |                          |              |
| Employee benefit cost  | 2,699,372                | 2,065,701    |
| Traveling expenses   | 34,277                   | 16,398       |
| Advertisements & sales promotion   | 8,890                    | 4,023        |
| Printing and stationery  | 25,192                   | 16,690       |
| Depreciation   | 63,408                   | 55,361       |
| Amortization of Intangible   | 1,600                    | -            |
| Rent, rates and taxes  | 25,715                   | 15,540       |
| Legal and professional charges - business related                                | 17,655                   | 13,491       |
| Electricity, gas and water   | 120,323                  | 81,784       |
| Entertainment  | 14,052                   | 9,239        |
| Vehicle running expenses   | 46,884                   | 28,075       |
| Office repairs and maintenance   | 34,756                   | 84,716       |
| Bank charges   | 1,064                    | 1,922        |
| Postages, telegrams and telephone  | 9,022                    | 9,588        |
| Insurance Expense  | 22,823                   | 24,650       |
| Annual Supervision fee SECP  | 37,840                   | 31,651       |
|  | 3,162,874                | 2,458,828    |

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

|  | 2023                     | 2022             |
|--|--------------------------|------------------|
|  | -----Rupees in '000----- |                  |
| <b>26.1 Employee benefit cost</b>  |                          |                  |
| Salaries, allowance and other benefits   | 1,615,910                | 1,175,903        |
| Charges for post employment benefit  | 1,083,462                | 889,798          |
|  | <u>2,699,372</u>         | <u>2,065,701</u> |
| <b>26.2 Office repairs and maintenance</b>                                     |                          |                  |
| Repairs and maintenance  | 142,285                  | 141,274          |
| Recovered from tenants   | (107,529)                | (56,559)         |
|  | <u>34,756</u>            | <u>84,716</u>    |
| <b>27 INVESTMENT INCOME</b>  |                          |                  |
| Income from equity securities- Held for Trading                                |                          |                  |
| - Dividend income  | 288,164                  | 324,613          |
| Income from equity securities- Available for Sale                              |                          |                  |
| - Dividend income  | 129,896                  | 94,724           |
| Held to maturity   |                          |                  |
| Income from government securities  |                          |                  |
| - Return on PIBs   | 2,220,069                | 3,076,395        |
| - Return on T-Bills  | 6,413,693                | 2,065,877        |
|  | <u>9,051,822</u>         | <u>5,561,609</u> |
| Net unrealized (losses) on investments   |                          |                  |
| Held for Trading   |                          |                  |
| unrealized gain/ (losses) on:  |                          |                  |
| -Equity securities   | <u>778,484</u>           | <u>(161,845)</u> |
| Total investment income  | 9,830,306                | 5,399,764        |
| Add: Reversal of Impairment of available for sale securities equity securities | 17,392                   | 52,664           |
| Less: Impairment in value of available for sale securities equity securities   | -                        | -                |
|  | <u>9,847,698</u>         | <u>5,452,428</u> |
| <b>28 RENTAL INCOME</b>  |                          |                  |
| Rental income  | 434,145                  | 353,429          |
|  | <u>434,145</u>           | <u>353,429</u>   |
| <b>29 OTHER INCOME</b>   |                          |                  |
| Return on bank balances  | 506,466                  | 220,134          |
| Gain/(loss) on sale of fixed assets  | 146                      | 1,162            |
| FCY (loss)/ gain   | 147,154                  | 1,220,466        |
| Miscellaneous Income   | 4,829                    | 12,742           |
|  | <u>658,595</u>           | <u>1,454,504</u> |
| <b>30 OTHER EXPENSES</b>   |                          |                  |
| Legal & professional fee other than business related                           | -                        | -                |
| Auditors' remuneration   | 4,320                    | 2,400            |
| Bad and doubtful debts   | 1,185,000                | -                |
| Others   | 63,105                   | 36,724           |
|  | <u>1,252,425</u>         | <u>39,124</u>    |
| <b>30.1 Auditors' remuneration</b>   |                          |                  |
| Audit fee  | 4,320                    | 2,400            |
| Out-of-pocket expenses   | -                        | -                |
|  | <u>4,320</u>             | <u>2,400</u>     |

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31 FINANCE COSTS

32 TAXATION

For the year  
- Current  
- Deferred

32.1 Relationship between tax expense and accounting profit

Profit before taxation  
Tax charge at enacted tax rate of 29 % (2022 : 29%)  
Tax effect of change in tax rate  
Tax effect of loss on revaluation of held for trading  
Tax effect of expenses that are not deductible in determining the taxable profit  
Tax effect of super tax

Disclose an explanation of changes in the applicable tax rate compared to the previous accounting period.

33 EARNINGS PER SHARE - BASIC AND DILUTED

Profit (after tax) for the year

Weighted average number of ordinary shares

Earnings per share

33.1 There is no dilutive effect on basic earnings per share, therefore basic EPS equals to diluted EPS.

34 COMPENSATION OF DIRECTORS AND EXECUTIVES

|   | Chief Executive          |        | Directors |      | Executives |         |
|---|--------------------------|--------|-----------|------|------------|---------|
|   | 2023                     | 2022   | 2023      | 2022 | 2023       | 2022    |
|   | -----Rupees in '000----- |        |           |      |            |         |
| Fees                                      | -                        | -      | 11,250    | -    | -          | -       |
| Managerial remuneration                   | 24,000                   | 18,000 | -         | -    | 977,312    | 530,255 |
| Leave encashment                          | -                        | -      | -         | -    | -          | -       |
| Bonus                                     | 7,622                    | 5,716  | -         | -    | 247,436    | 135,169 |
| Ex-gratia allowance                       | -                        | -      | -         | -    | -          | -       |
| Charge for defined benefit plan           | -                        | -      | -         | -    | -          | -       |
| Contribution to defined contribution plan | -                        | -      | -         | -    | -          | -       |
| Rent and house maintenance                | -                        | -      | -         | -    | -          | -       |
| Utilities                                 | -                        | -      | -         | -    | -          | -       |
| Medical                                   | -                        | -      | -         | -    | -          | -       |
| Conveyance                                | 1,192                    | -      | -         | -    | -          | -       |
| Others (to be specified, if material)     | -                        | -      | -         | -    | -          | -       |
|   | 32,813                   | 23,716 | 11,250    | -    | 1,224,748  | 665,424 |
| Number of persons                         | 1                        | 1      | 8         | -    | 511        | 500     |

34.1 No remuneration was paid to directors of the company.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**35 RELATED PARTY TRANSACTIONS**

- 35.1 Related party means an entity which has the ability to control the company or exercise significant influence over the company in making financial and operating decisions or vice versa.
- 35.2 The transactions with related parties are made at normal market prices. There have been no guarantees provided or received for any related party receivables or payables. Accrual of liability in respect of the pension benefit fund is made in accordance with the actuarial advice. The Company does not make any contribution to the provident fund. Remuneration to key management personnel are included in note 34 to these unconsolidated financial statement and are determined in accordance with the terms of their employment / appointment. Certain key management personnel are also provided with free use of the Company maintained vehicles and post retirement benefits in accordance with their entitlement under the terms of their employment.

**35.3 Profit oriented state-controlled entities - various**

|                           | 2023                     | 2022       |
|---------------------------|--------------------------|------------|
|                           | -----Rupees in '000----- |            |
| Insurance premium written | 29,738,144               | 24,049,441 |
| Insurance claims paid     | 3,597,484                | 2,362,247  |
| Re-insurance ceded        | 23,199,885               | 16,890,877 |
| Re-insurance recoveries   | 2,636,712                | 1,527,494  |

- 35.4 NICL is wholly owned government entity and is required to insured government assets as per Insurance Ordinance 2000, consequently most of the related party transactions are insurance transactions with other government entities. Further, NICL is obtaining facility management fee from its wholly owned subsidiary Civic Centre Company (Private) Limited.

**Transactions With Related Parties**

|  | 2023                     | 2022       |
|--|--------------------------|------------|
|  | -----Rupees in '000----- |            |
| <b>Related parties by virtue of common directorship and GOP holdings</b> |                          |            |
| Federal Board of Revenue / Sindh Board of Revenue                        |                          |            |
| Taxes paid   | 4,065,244                | 2,957,277  |
| Federal insurance fee payable  | 295,927                  | 303,228    |
| Withholding tax payable  |                          |            |
| <b>Securities Exchange Commission of Pakistan</b>                        |                          |            |
| Rent receivable  | 34,410                   | 34,410     |
| <b>State Life Insurance Corporation of Pakistan</b>                      |                          |            |
| Group insurance expense  | 22,823                   | 24,650     |
| Group insurance payable  | 685                      | 686        |
| <b>National Engineering Services Pakistan</b>                            |                          |            |
| Rent received  | 22,231                   | 18,769     |
| Rent receivable  | 37,830                   | 39,646     |
| <b>Balances With Related Parties</b>                                     |                          |            |
| Pakistan investment bonds  | 13,603,200               | 26,275,910 |
| Treasury Bills   | 40,071,538               | 22,427,263 |
| Investments in ordinary shares - market value as at December             | 493,037                  | 386,186    |
| <b>Others</b>  |                          |            |
| Defined benefit plans  | 6,853,955                | 6,327,403  |

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36 SEGMENT INFORMATION

The following segment information prepared in accordance with the requirements of Insurance Ordinance, 2000 and the Insurance Rules, 2017 for class of business wise revenues, results, assets and liabilities.

| 2023  | Fire and property damage | Marine, aviation and transport | Motor     | Engineering  | Miscellaneous | Treaty | Total        |
|---|--------------------------|--------------------------------|-----------|--------------|---------------|--------|--------------|
|   | Rupees in '000           |                                |           |              |               |        |              |
| Premium receivable (Inclusive of Federal Excise Duty, Gross written premium (Inclusive of Administrative Surcharge) | 7,714,941                | 10,492,410                     | 928,863   | 14,548,817   | 838,610       | -      | 34,523,641   |
| Gross direct premium  | 6,653,196                | 9,022,100                      | 804,555   | 12,538,395   | 723,055       | -      | 29,741,301   |
| Facultative inward premium  | -                        | -                              | -         | -            | -             | -      | -            |
| Administrative surcharge  | -                        | -                              | -         | -            | -             | -      | -            |
| Insurance premium earned  | 6,653,196                | 9,022,100                      | 804,555   | 12,538,395   | 723,055       | -      | 29,741,301   |
| Insurance premium ceded to reinsurers   | 5,828,644                | 8,840,229                      | 802,609   | 10,963,453   | 650,861       | -      | 27,085,796   |
| Net insurance premium   | (3,867,790)              | (6,298,813)                    | (17,764)  | (10,999,942) | (188,603)     | -      | (21,372,912) |
| Commission income   | 1,960,854                | 2,541,417                      | 784,845   | (36,489)     | 462,258       | -      | 5,712,884    |
| Net underwriting income   | 76,965                   | 200,688                        | 435       | 493,896      | 6,034         | -      | 778,018      |
| Insurance claims  | 2,037,819                | 2,742,105                      | 785,280   | 457,407      | 468,292       | -      | 6,490,903    |
| Net claims  | (655,365)                | (549,642)                      | (176,910) | 360,302      | (34,139)      | -      | (1,055,754)  |
| Management expenses   | (655,365)                | (549,642)                      | (176,910) | 360,302      | (34,139)      | -      | (1,055,754)  |
| Net insurance claims and expenses   | (707,542)                | (959,466)                      | (85,561)  | (1,333,410)  | (76,894)      | -      | (3,162,874)  |
| Underwriting result   | (1,362,907)              | (1,509,108)                    | (262,471) | (973,108)    | (111,033)     | -      | (4,218,627)  |
| Net investment income   | 674,912                  | 1,232,997                      | 522,809   | (515,701)    | 357,259       | -      | 2,272,276    |
| Rental income   | -                        | -                              | -         | -            | -             | -      | 9,847,698    |
| Other income  | -                        | -                              | -         | -            | -             | -      | 434,145      |
| Other expenses  | -                        | -                              | -         | -            | -             | -      | 658,595      |
| (Charge)/Reversal of impairment of investment property  | -                        | -                              | -         | -            | -             | -      | (1,252,425)  |
| Profit before tax   | -                        | -                              | -         | -            | -             | -      | 11,960,288   |
| Segment assets  | 2,276,161                | 9,360,360                      | 82,639    | 35,045,193   | 184,777       | -      | 46,949,130   |
| Unallocated assets  | -                        | -                              | -         | -            | -             | -      | 97,465,379   |
| Total Assets  | -                        | -                              | -         | -            | -             | -      | 144,414,510  |
| Segment liabilities   | 2,204,697                | 3,784,107                      | 337,346   | 35,007,384   | 474,235       | -      | 41,807,769   |
| Unallocated liabilities   | -                        | -                              | -         | -            | -             | -      | 43,055,327   |
| Total Liabilities   | -                        | -                              | -         | -            | -             | -      | 84,863,095   |

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| 2022  | Fire and property damage | Marine, aviation and transport | Motor     | Engineering | Miscellaneous | Treaty | Total        |
|---|--------------------------|--------------------------------|-----------|-------------|---------------|--------|--------------|
|   | Rupees in '000           |                                |           |             |               |        |              |
| Premium receivable (inclusive of Federal Excise Duty)         | 5,193,296                | 10,031,257                     | 851,916   | 11,004,793  | 785,687       | -      | 27,866,955   |
| Gross written premium (inclusive of Administrative Surcharge) | 4,537,100                | 8,482,322                      | 737,523   | 9,632,793   | 659,706       | -      | 24,049,441   |
| Gross direct premium  | 4,537,100                | 8,482,322                      | 737,523   | 9,632,793   | 659,706       | -      | 24,049,441   |
| Facultative inward premium                                    | -                        | -                              | -         | -           | -             | -      | -            |
| Administrative surcharge                                      | -                        | -                              | -         | -           | -             | -      | -            |
| Insurance premium earned                                      | 4,246,467                | 7,158,409                      | 698,480   | 9,031,343   | 548,955       | -      | 21,683,657   |
| Insurance premium ceded to reinsurers                         | (2,188,789)              | (5,165,704)                    | -         | (7,574,791) | (82,027)      | -      | (15,011,313) |
| Net insurance premium   | 2,057,678                | 1,992,705                      | 698,480   | 1,456,553   | 466,928       | -      | 6,672,344    |
| Commission income   | 42,129                   | 146,537                        | -         | 362,285     | 1,932         | -      | 552,884      |
| Net underwriting income                                       | 2,099,807                | 2,139,242                      | 698,480   | 1,818,838   | 468,860       | -      | 7,225,227    |
| Insurance claims  | 733,767                  | (119,434)                      | (189,588) | (2,258,008) | 22,976        | -      | (1,810,286)  |
| Net Claims  | 733,767                  | (119,434)                      | (189,588) | (2,258,008) | 22,976        | -      | (1,810,286)  |
| Management expenses   | (463,876)                | (867,237)                      | (75,405)  | (984,862)   | (67,449)      | -      | (2,458,828)  |
| Net insurance claims and expenses                             | 269,892                  | (986,671)                      | (264,993) | (3,242,870) | (44,472)      | -      | (4,269,114)  |
| Underwriting result   | 2,369,699                | 1,152,570                      | 433,487   | (1,424,031) | 424,387       | -      | 2,956,113    |
| Net investment income   | -                        | -                              | -         | -           | -             | -      | 5,452,428    |
| Rental income   | -                        | -                              | -         | -           | -             | -      | 353,429      |
| Other income  | -                        | -                              | -         | -           | -             | -      | 1,454,504    |
| Other expenses  | -                        | -                              | -         | -           | -             | -      | (39,124)     |
| (Charge)/Reversal of impairment of investment property        | -                        | -                              | -         | -           | -             | -      | -            |
| Profit before tax   | -                        | -                              | -         | -           | -             | -      | 10,177,349   |
| Segment assets  | 4,272,180                | 4,577,853                      | 28,710    | 4,313,468   | 113,983       | -      | 13,306,194   |
| Unallocated assets  | -                        | -                              | -         | -           | -             | -      | 115,964,371  |
| Total Assets  | -                        | -                              | -         | -           | -             | -      | 129,270,565  |
| Segment liabilities   | 3,578,800                | 4,342,463                      | 252,532   | 3,546,354   | 632,460       | -      | 12,352,609   |
| Unallocated liabilities                                       | -                        | -                              | -         | -           | -             | -      | 66,397,974   |
| Total Liabilities   | -                        | -                              | -         | -           | -             | -      | 78,750,583   |

36.1 All segments of the Company is confined in the geographical limits of Pakistan.

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37 MOVEMENT IN INVESTMENTS

|  | Held to maturity | Available for sale | Fair value through P&L | Total        |
|--|------------------|--------------------|------------------------|--------------|
| At beginning of previous year  |                  |                    |                        |              |
| Additions  | 41,893,542       | 3,661,264          | 1,661,608              | 47,216,415   |
| Disposals (sale and redemptions)   | 52,870,492       | 5,562              |                        | 52,876,054   |
| Fair value net gains (excluding net realized gains)                      | (46,060,861)     | (491,395)          | (108,071)              | (46,660,327) |
| Designated at fair value through profit or loss upon initial recognition | -                | -                  | -                      | -            |
| Classified as held for trading   | -                | -                  | -                      | -            |
| Impairment losses  | -                | -                  | -                      | -            |
| Reversal of impairment   | -                | -                  | -                      | -            |
| At beginning of current year   |                  | 52,664             | -                      | 52,664       |
| Additions  | 46,703,173       | 3,228,095          | 1,553,537              | 53,484,805   |
| Disposals (sale and redemptions)   | 87,355,581       | 30,947             |                        | 87,386,528   |
| Fair value net gains (excluding net realized gains)                      | (82,384,017)     |                    |                        | (82,384,017) |
| Designated at fair value through profit or loss upon initial recognition | -                | 1,208,407          | 778,483                | 1,986,890    |
| Classified as held for trading   | -                | 25,692             | -                      | 25,692       |
| Impairment losses  | -                | -                  | -                      | -            |
| Reversal of impairment   | -                | -                  | -                      | -            |
| At end of current year   |                  | 17,392             | -                      | 17,392       |
|  | 53,674,738       | 4,510,533          | 2,332,020              | 60,517,291   |

38 MANAGEMENT OF INSURANCE RISK AND FINANCIAL RISK

The company issues contracts that transfer insurance risk or financial risk or both. This section summarizes these risks and the way company manages them.

38.1 INSURANCE RISK

The risk under any insurance contract is the possibility that the insured event occurs and the uncertainty in the amount of compensation to the insured. Generally most insurance contracts carry the insurance risk for a period of one year.

The Company accepts insurance through issuance of general insurance contracts. For these general insurance contracts the most significant risks arise from fire, atmospheric disturbance, earthquake, terrorist activities and other catastrophes.

The Company's risk exposure is mitigated by employing a formal practices to identify, assess, manage and monitor risk. These include implementation of underwriting strategies which aim to ensure that the underwritten risks are well diversified in terms of type and amount of the risk. Adequate reinsurance is arranged to mitigate the effect of the potential loss to the Company from individual to large or catastrophic insured events. Further, the Company adopts claim review policies including active management and prompt pursuing of the claims, regular detailed review of claim handling procedures and frequent investigation of possible false claims to reduce the insurance risk.

a) Frequency and severity of claims

Risk associated with general insurance contracts includes the reasonable possibility of significant loss as well as the frequent occurrence of the insured events. This has been managed by having in place underwriting strategy, reinsurance arrangements and proactive claim handling procedures.

Concentration of risk

The concentration of risk by type of contracts and major policyholders is summarized below:

|                          | Number of policyholders | 2023              |                 |                       |            |
|--------------------------|-------------------------|-------------------|-----------------|-----------------------|------------|
|                          |                         | Gross sum insured | Premium written | Total premium written | Percentage |
|                          |                         | Rupees in '000    |                 |                       |            |
| Direct and facultative   |                         |                   |                 |                       |            |
| Fire and property damage | 7                       | 5,655,608,432     | 5,665,225       | 6,653,106             | 85%        |
| Marine cargo             | 10                      | 1,363,372,435     | 1,741,552       | 2,131,321             | 82%        |
| Marine hull              | 2                       | 318,677,882       | 656,571         | 744,345               | 88%        |
| Aviation                 | 5                       | 1,041,324,021     | 6,033,325       | 6,146,433             | 90%        |
| Motor                    | 9                       | 33,451,702        | 465,133         | 804,555               | 58%        |
| Engineering              | 5                       | 8,260,427,452     | 10,846,626      | 12,538,395            | 87%        |
| Liability and others     | 9                       | 323,457,588       | 644,188         | 723,055               | 89%        |
|                          |                         | 16,996,319,512    | 26,052,620      | 29,741,301            |            |

|                          | Number of policyholders | 2022              |                 |                       |            |
|--------------------------|-------------------------|-------------------|-----------------|-----------------------|------------|
|                          |                         | Gross sum insured | Premium written | Total premium written | Percentage |
|                          |                         | Rupees in '000    |                 |                       |            |
| Direct and facultative   |                         |                   |                 |                       |            |
| Fire and property damage | 7                       | 6,346,609,653     | 3,885,239       | 4,537,100             | 86%        |
| Marine cargo             | 5                       | 1,688,190,770     | 1,698,991       | 2,185,234             | 78%        |
| Marine hull              | 2                       | 268,245,656       | 559,398         | 635,887               | 88%        |
| Aviation                 | 3                       | 1,111,984,953     | 5,440,984       | 5,861,202             | 96%        |
| Motor                    | 7                       | 26,786,286        | 406,516         | 737,523               | 55%        |
| Engineering              | 5                       | 1,714,734,150     | 8,283,023       | 9,632,790             | 80%        |
| Liability and others     | 6                       | 165,599,953       | 555,971         | 659,706               | 84%        |
|                          |                         | 11,322,151,419    | 20,830,123      | 24,049,441            |            |

The above disclosed figures are ascertained on tentative basis with an object to reflect Company's major risk exposures.

b) Sources of uncertainty in estimation of future claim payments

Claims on general insurance contracts are payable on a claim occurrence basis. The Company is liable for all insured events that occur during the term of the insurance contract including the event reported after the expiry of the insurance contract term.

An estimated amount of the claim is recorded immediately on the intimation to the Company. The estimation of the amount is based on management judgment or preliminary assessment by the independent surveyor appointed for this purpose. The initial estimates include expected settlement cost of the claims. The estimation of provision of claims incurred but not reported (IBNR) is based on analysis of the past claim reporting pattern.

There are several variable factors which affect the amount and timing of recognized claim liabilities. The Company takes all reasonable measures to mitigate the factors affecting the amount and timing of claim settlements. However, uncertainty prevails with estimated claim liabilities and it is likely that final settlement of these liabilities may be different from initial recognized amount. Similarly, the provision for claims incurred but not reported is based on historic reporting pattern of the claims; hence, actual amount of incurred but not reported claims may differ from the amount estimated.

c) Key assumptions

The process used to determine the assumptions for calculating the outstanding claim reserves is intended to result in neutral estimates of the most likely or expected outcome. The nature of the business makes it very difficult to predict with certainty the likely outcome of any particular claim and the ultimate cost of notified claims. Each notified claim is assessed in separate, case to case basis, with due regard to claim circumstances, information available from surveyors and historical evidence of the size of similar claims. Case estimates are reviewed regularly and updated as and when new information is available.

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The principal assumption underlying the liability estimation of IBNR and Premium Deficiency Reserve is that the Company's future claim development will follow similar historical pattern for occurrence and reporting. The management uses qualitative judgment to assess the extent to which past occurrence and reporting pattern will not apply in future. The judgment includes external factors e.g. treatment of one-off occurrence claims, changes in market factors, economic conditions, etc. The internal factors such as portfolio mix, policy conditions and claim handling procedures are further used in this regard.

d) Changes in assumptions

The company did not change its assumptions for the insurance contracts as disclosed in above (b) and (c)

e) Sensitivity analysis

The risks associated with the insurance contracts are complex and subject to a number of variables which complicate quantitative sensitivity analysis. The Company makes various assumptions and techniques based on past claims development experience. The Company considers that the liability for insurance claims recognized in the balance sheet is adequate. However, actual experience will differ from the expected outcome.

As the Company enters into short term insurance contracts, it does not assume any significant impact of changes in market conditions on unexpired risks. However, some results of sensitivity testing are set out below, showing the impact on profit before tax net of reinsurance.

10% increase in claims liability net:

Fire and property damage  
Marine, aviation and transport  
Motor  
Engineering  
Miscellaneous

| 2023           |                      | 2022           |                      |
|----------------|----------------------|----------------|----------------------|
| Pre tax profit | Shareholder's equity | Pre tax profit | Shareholder's equity |
| Rupees in '000 |                      |                |                      |
| 697,421        | 370,527              | 2,132,729      | 1,300,965            |
| 1,109,697      | 676,919              | 1,037,313      | 632,761              |
| 470,528        | 287,022              | 390,138        | 237,984              |
| (484,131)      | (283,120)            | (1,281,628)    | (781,793)            |
| 321,533        | 196,135              | 381,949        | 232,989              |
| 2,045,048      | 1,247,479            | 2,660,502      | 1,622,906            |

10% decrease in claims liability net:

Fire and property damage  
Marine, aviation and transport  
Motor  
Liability  
Miscellaneous

|           |           |             |           |
|-----------|-----------|-------------|-----------|
| 742,403   | 452,866   | 2,606,609   | 1,590,066 |
| 1,356,297 | 827,341   | 1,267,828   | 773,375   |
| 575,089   | 350,805   | 476,838     | 290,870   |
| (567,272) | (346,036) | (1,566,434) | (955,525) |
| 392,985   | 239,721   | 468,826     | 284,764   |
| 2,499,503 | 1,524,697 | 3,251,724   | 1,983,552 |

38.1.1 Reinsurance risk

Reinsurance ceded does not relieve the Company from its obligation towards policy holders and, as a result, the Company remains liable for the portion of outstanding claims reinsured to the extent that reinsurer fails to meet the obligation under the reinsurance agreements.

An analysis of all reinsurance assets recognized by the rating of the entity from which it is due are as follows:

| Amount due from other insurers / reinsurers | Reinsurance recoveries against outstanding claims | Prepaid reinsurance premium ceded | 2023       | 2022       |
|---|---|-----------------------------------|------------|------------|
| Rupees in '000                              |   |                                   |            |            |
| -   | 40,805,714  | 11,162,718                        | 51,968,432 | 44,583,285 |
| -   | 40,805,714  | 11,162,718                        | 51,968,432 | 44,583,285 |

As or above (including Pakistan Reinsurance Company Limited)  
Total

38.1.2 Geographical concentration of insurance risk

The company does not have a formal mechanism for monitoring and management of concentration of insurance risk, except for timely arrangement of reinsurance. The Company has determined amount/ratio of retention for each significant client and accordingly obtain reinsurance cover for the policies.

38.2 FINANCIAL RISK

Introduction and overview

The Company has exposure to the following risks from financial instruments that could result in a reduction in the Company's net assets or a reduction in the profits available for dividends:

- Market risk; comprising of price risk, interest rate risk and foreign currency risk
- Credit risk
- Liquidity risk

38.2.1 Financial risk factors and risk management framework

The Company's overall risk management program focuses on the unpredictability of financial markets and seeks to minimize potential adverse effects on the Company's financial performance.

The Company's objective in managing risk is the creation and protection of shareholders' value. Risk is inherent in Company's activities but it is managed through monitoring and controlling activities which are based on limits established by the internal controls set on different activities of the Company.

The Board of Directors has the overall responsibility for the establishment and oversight of the Company's risk management framework. There are Board Committees for developing risk management policies and its monitoring.

(a) Price risk

Price risk is the risk that the value of a financial instrument will fluctuate as a result of changes in market prices, whether those changes are caused by factors specific to the individual security, or its issuer or factors affecting all securities traded in the market.

The Company is exposed to market risk with respect to its investments. As at year end, total market risk exposure of investment amounts to Rs. 6,842 million (2022: Rs. 4,781 million).

The Company limits market risk by maintaining a diversified portfolio and by continuous monitoring of developments in equity and debt securities. In addition, the Company actively monitors the key factor that affect stock exchange.

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Sensitivity analysis

The table below summarizes the Company's equity price risk as of December 31, 2023 and 2022 and shows the effects of a hypothetical 10% increase and a 10% decrease in market prices as at the year end. The selected hypothetical change does not reflect what could be considered to be the best or worst case scenarios. Indeed, results could be worse in Company's equity investment portfolio because of the nature of equity markets.

|                   | Fair value     | Hypothetical price change    | Estimated fair value after hypothetical change in price | Hypothetical increase / (decrease) in shareholder's equity | Hypothetical increase / (decrease) in profit / (loss) before tax |
|-------------------|----------------|------------------------------|---|--|--|
|                   | Rupees in '000 |                              |   |  |  |
| December 31, 2023 | 6,842,554      | 10% increase<br>10% decrease | 7,526,810<br>6,158,299                                  | 684,255<br>(684,255)                                       | 458,451<br>(458,451)   |
| December 31, 2022 | 4,781,632      | 10% increase<br>10% decrease | 5,259,795<br>4,303,469                                  | 537,665<br>(537,665)                                       | 327,975<br>(327,975)   |

(b) Interest rate risk

Interest risk is the risk that the value of the financial instrument will fluctuate due to changes in the market yield / mark-up rates. Sensitivity to interest rate risk arises from mismatches of financial assets and liabilities that mature or reprice in a given period. The Company manages these mismatches through risk management strategies where significant changes in gap position can be adjusted. The Company is exposed to interest rate risk in respect of the following:

|   | Interest / Mark up bearing |                         |            | Non-interest / Non-mark up bearing |                         |            | Total       |
|---|----------------------------|-------------------------|------------|------------------------------------|-------------------------|------------|-------------|
|   | Maturity up to one year    | Maturity after one year | Sub-total  | Maturity up to one year            | Maturity after one year | Sub-total  |             |
|   | Rupees in '000             |                         |            |                                    |                         |            |             |
| FINANCIAL ASSETS                                |                            |                         |            |                                    |                         |            |             |
| Cash  | 10,898,131                 | -                       | 10,898,131 | (383,019)                          | -                       | (383,019)  | 10,515,112  |
| Investments                                     | -                          | 40,071,538              | 40,071,538 | 6,842,554                          | -                       | 6,842,554  | 46,914,092  |
| Loans and other Receivables                     | -                          | -                       | -          | 2,645,438                          | 71,790                  | 2,717,227  | 2,717,227   |
| Insurance/Reinsurance Receivable                | -                          | -                       | -          | 12,025,560                         | -                       | 12,025,560 | 12,025,560  |
| Insurance recoveries against outstanding claims | -                          | -                       | -          | 40,492,438                         | -                       | 40,492,438 | 40,492,438  |
| December 31, 2023                               | 10,898,131                 | 40,071,538              | 50,969,669 | 61,822,959                         | 71,790                  | 61,894,750 | 112,864,428 |

|   |            |            |            |             |        |             |             |
|---|------------|------------|------------|-------------|--------|-------------|-------------|
| FINANCIAL LIABILITIES   |            |            |            |             |        |             |             |
| Underwriting provisions for outstanding claims including IBNR | -          | -          | -          | -           | -      | -           | -           |
| Premium Received in advance                                   | -          | -          | -          | 47,490,353  | -      | 47,490,353  | 47,490,353  |
| Insurance/Reinsurance payable                                 | -          | -          | -          | 1,292,550   | -      | 1,292,550   | 1,292,550   |
| Other creditors and accruals                                  | -          | -          | -          | 9,143,088   | -      | 9,143,088   | 9,143,088   |
| December 31, 2023   | -          | -          | -          | 57,925,991  | -      | 57,925,991  | 57,925,991  |
|   | 10,898,131 | 40,071,538 | 50,969,669 | 119,548,960 | 71,790 | 119,620,750 | 170,590,419 |

|   | Interest / Mark up bearing |                         |            | Non-Interest / Non-mark up bearing |                         |            | Total      |
|---|----------------------------|-------------------------|------------|------------------------------------|-------------------------|------------|------------|
|   | Maturity up to one year    | Maturity after one year | Sub-total  | Maturity up to one year            | Maturity after one year | Sub-total  |            |
|   | Rupees in '000             |                         |            |                                    |                         |            |            |
| FINANCIAL ASSETS                                  |                            |                         |            |                                    |                         |            |            |
| Cash  | 2,149,535                  | -                       | 2,149,535  | 2,838,635                          | -                       | 2,838,635  | 4,988,170  |
| Investments                                       | -                          | 35,244,473              | 35,244,473 | 4,781,632                          | -                       | 4,781,632  | 40,026,105 |
| Loans and other Receivables                       | -                          | -                       | -          | 2,862,096                          | 65,822                  | 3,027,918  | 3,027,918  |
| Insurance/Reinsurance Receivable                  | -                          | -                       | -          | 16,199,181                         | -                       | 16,199,181 | 16,199,181 |
| Reinsurance recoveries against outstanding claims | -                          | -                       | -          | 35,621,925                         | -                       | 35,621,925 | 35,621,925 |
| December 31, 2022                                 | 2,149,535                  | 35,244,473              | 37,394,008 | 62,403,470                         | 65,822                  | 62,469,292 | 99,863,300 |

|   |           |            |            |             |        |             |             |
|---|-----------|------------|------------|-------------|--------|-------------|-------------|
| FINANCIAL LIABILITIES   |           |            |            |             |        |             |             |
| Underwriting provisions for outstanding claims including IBNR | -         | -          | -          | -           | -      | -           | -           |
| Premium Received in advance                                   | -         | -          | -          | 42,193,872  | -      | 42,193,872  | 42,193,872  |
| Insurance/Reinsurance payable                                 | -         | -          | -          | 1,540,822   | -      | 1,540,822   | 1,540,822   |
| Other creditors and accruals                                  | -         | -          | -          | 11,487,252  | -      | 11,487,252  | 11,487,252  |
| December 31, 2022   | -         | -          | -          | 55,221,946  | -      | 55,221,946  | 55,221,946  |
|   | 2,149,535 | 35,244,473 | 37,394,008 | 117,625,415 | 65,822 | 117,691,237 | 155,085,246 |

(c) Foreign exchange risk

Foreign currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Company principal transactions are carried out in Pakistani Rupee and its exposure to foreign exchange risk arises primarily with respect to US Dollar and UK Pound. Financial assets and liabilities exposed to foreign exchange risk amounted to Rs. 17.94 billion (2022: Rs. 5.14 billion) and Rs. 15.17 billion (2022: Rs. 3.09 billion) respectively, at the end of the year. The Company has made appropriate policies to manage foreign exchange risk.

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### 38.3 Credit risk and concentration of credit risk

Credit risk is the risk, which arises with the possibility that one party to a financial instrument will fail to discharge its obligation and cause the other party to incur a financial loss. Concentration of credit risk arises when a number of counterparties have a similar type of business activities. As a result, any change in economic, political or other conditions would affect their ability to meet contractual obligation in the similar manner.

The Company attempts to control credit risk by monitoring credit exposures by undertaking transaction with the large number of counterparties in various industries and by continually assessing the credit worthiness of counterparties. The management monitors exposure to credit risk through regular review of credit exposure and prudent estimates of provisions to doubtful receivables. Further, the major insurance business customers of the Company are government entities, as all government entities are required under the Insurance Ordinance, 2000 to make their insurance arrangements with NICL.

The Company is exposed to the credit risk in respect of the following financial assets:

| Financial assets                                  |               | 2023            |                        | 2022            |                        |
|---|---------------|-----------------|------------------------|-----------------|------------------------|
|   |               | Carrying amount | Exposed to credit risk | Carrying amount | Exposed to credit risk |
|   |               | Rupees in '000  |                        |                 |                        |
| Cash and bank                                     |               |                 |                        |                 |                        |
| Investments                                       | 16            | 10,515,112      | 10,515,112             | 4,988,170       | 4,988,170              |
| Loans and other Receivables                       | 8, 9, 10 & 11 | 60,875,853      | 6,842,554              | 53,843,366      | 4,781,532              |
| Insurance/Reinsurance Receivable                  | 11            | 2,717,227       | 2,717,227              | 3,027,918       | 3,027,918              |
| Reinsurance recoveries against outstanding claims | 12            | 12,025,560      | 12,025,560             | 16,199,181      | 16,199,181             |
|   | 24            | 40,805,714      | 40,805,714             | 35,247,540      | 35,247,540             |
|   |               | 126,939,466     | 72,906,167             | 113,306,175     | 64,244,642             |

The financial assets as at the year end included Rs. 54.033 billion (2022: Rs.49.062 billion) which have been invested in risk free government securities. For the remaining financial assets of Rs. 72.906 billion (2022: Rs.64.244 billion), the Company attempts to control credit risk by monitoring the credit exposure, limiting transaction with specific customers and continuing assessment of credit worthiness of the customers.

The credit quality of the Company's bank balances can be assessed with reference to external credit ratings as follows:

|                                   | Rating     |           | Rating Agency  | 2023           |  | 2022           |  |
|-----------------------------------|------------|-----------|----------------|----------------|--|----------------|--|
|                                   | Short term | Long term |                | Rupees in '000 |  | Rupees in '000 |  |
| Allied Bank Limited               | A1+        | AAA       | PACRA          | 2              |  | 2              |  |
| Habib Bank Limited                | A-1+       | AAA       | JCR-VIS        | 2,441,854      |  | 2,223,875      |  |
| MCB Bank Limited                  | A1+        | AAA       | PACRA          | 113            |  | 113            |  |
| National Bank of Pakistan Limited | A1+/A-1+   | AAA/AAA   | PACRA/ JCR-VIS | 8,063,036      |  | 2,763,204      |  |
| United Bank Limited               | A-1+       | AAA       | JCR-VIS        | 1,067          |  | 1,067          |  |
| National Savings Account          | A1+/A-1+   | AAA/AAA   | PACRA/ JCR-VIS | 11             |  | 11             |  |
|                                   |            |           |                | 10,508,084     |  | 4,988,170      |  |

### 38.4 Liquidity risk

Liquidity risk is the risk that the Company will not be able to meet its funding requirements. To guard against this risk, the Company has diversified funding sources and assets are managed with liquidity in mind, maintaining a healthy balance of cash and cash equivalents and readily marketable securities. The maturity profile is monitored to ensure that adequate liquidity is maintained.

The following are the contractual maturities of financial liabilities:

| Financial Liabilities             | 2023            |               |                       |
|-----------------------------------|-----------------|---------------|-----------------------|
|                                   | Carrying Amount | Upto one year | Greater than one year |
| Outstanding claims including IBNR | 47,490,353      | 47,490,353    |                       |
| Insurance/Reinsurance payable     | 9,143,088       | 9,143,088     |                       |
| Other creditors and accruals      | 4,194,662       | 4,194,662     |                       |
|                                   | 60,828,103      | 60,828,103    | -                     |
| Financial Liabilities             | 2022            |               |                       |
|                                   | Carrying Amount | Upto one year | Greater than one year |
| outstanding claims including IBNR | 42,193,872      | 42,193,872    | -                     |
| Insurance/Reinsurance payable     | 11,487,252      | 11,487,252    | -                     |
| Other creditors and accruals      | 4,001,470       | 4,001,470     | -                     |
|                                   | 57,682,593      | 57,682,593    | -                     |

### 39 Capital management

Capital management objectives and requirements related to regulatory, solvency and paid up capital requirements are set and regulated by the Securities and Exchange Commission of Pakistan (SECP). These objectives and requirements are put in place to ensure sufficient solvency margins. Further, objective are set by the Company to maintain a strong credit rating and healthy capital ratios in order to support business objectives, maximize shareholders value and provide returns for benefits for other stakeholders.

The Company manages its capital structure which comprises capital and reserves by monitoring return on net assets and makes adjustments to it in the light of changes in economic conditions. In order to maintain or adjust the capital structure, the Company may adjust the amount of dividend paid to shareholders and/or issue new shares.

The Company is financed by internal sources and is compliant with the externally imposed capital requirements as set by the SECP. Minimum paid-up capital requirement for non-life insurers was Rs. 300 million in December 31, 2015. It has been raised to Rs. 500 million in December 31, 2017. The Company's current paid-up capital of Rs. 2,000 million is well in excess of the limit prescribed by the SECP.

There were no changes to Company's approach to capital management during the year.

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**NATIONAL INSURANCE COMPANY LIMITED**  
**NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2023**

**40 FINANCIAL INSTRUMENTS BY CATEGORY**

**40.1 Financial assets as per balance sheet**

2023 2022  
 ----- Rupees in '000 -----

Held-to-maturity

- Investment in Debt securities

Pakistan Investment Bonds

Term deposit certificates

13,603,200 26,275,910

Held-for-trading

- Ordinary / preference shares of listed companies

13,603,200 26,275,910

Available-for-sale

- Investment in Equity securities

Ordinary shares of listed companies

Mutual funds

2,332,022 1,553,537

97,125 79,733

3,179,309 3,639,757

1,208,407 (491,395)

4,484,841 3,228,095

Loans and receivables at amortized cost

- Loans and other receivables

- Insurance / reinsurance receivables

- Reinsurance recoveries against outstanding claims

- Cash and bank balances

2,717,227 3,027,918

12,025,560 16,199,181

40,492,438 35,621,925

10,515,112 4,988,170

65,750,336 59,837,194

86,170,399 90,894,737

**40.2 Financial liabilities as per balance sheet**

Financial liabilities measured at amortized cost

- Premium received in advance

- Insurance / reinsurance payables

- Other creditors and accruals

1,292,550 1,540,822

9,143,088 11,487,251

4,194,662 4,001,470

14,630,300 17,029,543

**41 FAIR VALUE OF FINANCIAL INSTRUMENTS**

IFRS 13 defines fair value as an exit price. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

41.1 All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

Level 1: Quoted (unadjusted) market prices in active markets for identical assets or liabilities.

Level 2: Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly (i.e. as prices) or indirectly observable (i.e. derived from prices).

Level 3: Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

Following are the assets where fair value is only disclosed and is different from their carrying value:

|   | 2023                       |         |         | Total     |
|---|----------------------------|---------|---------|-----------|
|   | Level 1                    | Level 2 | Level 3 |           |
|   | ----- Rupees in '000 ----- |         |         |           |
| Land  | -                          | -       | -       | -         |
| Buildings                                   | -                          | -       | -       | -         |
| Investment classified as held for trading   | 2,332,022                  | -       | -       | 2,332,022 |
| Investment classified as held to maturity   | -                          | -       | -       | -         |
| Investment classified as available for sale | 4,484,841                  | -       | -       | 4,484,841 |
|   | 6,816,863                  | -       | -       | 6,816,863 |
|   | -----                      |         |         |           |
|   | 2022                       |         |         | Total     |
|   | Level 1                    | Level 2 | Level 3 |           |
|   | ----- Rupees in '000 ----- |         |         |           |
| Land  | -                          | -       | -       | -         |
| Buildings                                   | -                          | -       | -       | -         |
| Investment classified as held for trading   | 1,553,537                  | -       | -       | 1,553,537 |
| Investment classified as held to maturity   | -                          | -       | -       | -         |
| Investment classified as available for sale | 3,228,095                  | -       | -       | 3,228,095 |
|   | 4,781,632                  | -       | -       | 4,781,632 |

41.2 The fair value of traded investments is based on quoted market prices, except for tradable securities classified by the Company as 'held to maturity'. Quoted securities classified as held to maturity are carried at cost. Fair value of unquoted equity investments other than investments in subsidiaries is determined on the basis of break up value of these investments as per the latest available audited financial statements.

- a) Financial instruments included in level 1 comprise of investments in listed ordinary shares and units of mutual funds.
- b) Financial instruments included in level 2 comprise of Pakistan Investment Bonds, Market Treasury Bills, Term Deposit Certificates and Term Finance Certificates.

*Signature*

NATIONAL INSURANCE COMPANY LIMITED  
NOTES TO THE UNCONSOLIDATED FINANCIAL STATEMENTS  
FOR THE YEAR ENDED DECEMBER 31, 2023

42 CORRESPONDING FIGURES

Corresponding figures have been rearranged and reclassified, wherever necessary, to align them with the presentation requirements of the Insurance Accounting Regulations, 2017.

43 NUMBER OF EMPLOYEES

As at 31 December

Average number of employees during the year

| 2023     | 2022 |
|----------|------|
| (Number) |      |
| 606      | 610  |
| 608      | 590  |

44 DATE OF AUTHORISATION FOR ISSUE

These unconsolidated financial statements were authorized for issue in the Board of Directors meeting held on

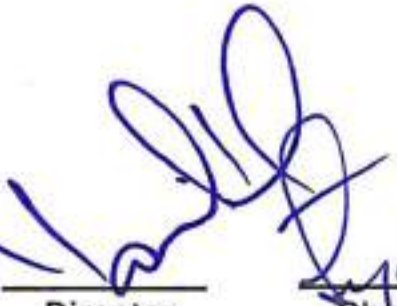
18 APR 2025


45 GENERAL

The figures in the financial statements may be rounded off to the nearest thousand rupees unless otherwise stated.

  
Chief Executive Officer

  
Director

  
Director

  
Chairman