

Managing Risks of Trade-Based Money Laundering & Terrorist Financing

Master the latest SBP framework: EPD Circular Letter No. 08 (August 12, 2025)

THE GAP

The State Bank of Pakistan has updated its framework for TBML and Terrorist Financing through EPD Circular Letter No. 08 (August 12, 2025), introducing new requirements for managing one of the highest-risk channels for financial crime. Teams need practical guidance to understand, interpret, and implement the new framework, including the expanded list of TBML red flags, to minimize regulatory penalties and ensure robust oversight in every trade transaction.

THE SHIFT

- From treating TBML as a documentation exercise to spotting red flags in the actual transaction flow
- From generic KYC to risk-calibrated CDD and enhanced due diligence
- From reacting to regulatory penalties to building governance that prevents them

WHAT'S INSIDE

- SBP's revised TBML/TF requirements under EPD Circular Letter No. 08
- TBML typologies and red flags across trade transactions
- Framework for robust trade customer KYC, CDD, and client onboarding
- Enhanced due diligence of high-risk transactions
- Transaction due diligence and monitoring (screening, price due diligence, FI due diligence, TMS)
- PSW: FI and GD requirements
- Minimizing regulatory penalties and non-compliance risk
- Governance and oversight structures
- Real case studies and practical implementation guidance

WHAT YOU WALK AWAY WITH

- Understand and implement SBP's revised TBML/TF guidelines
- Identify TBML typologies and red flags in trade transactions
- Apply robust KYC, CDD, and enhanced due diligence frameworks
- Reduce exposure to regulatory penalties
- Strengthen governance and oversight across trade functions

WHO IT'S FOR

- Senior Management in Trade, Compliance, Risk, and Audit
- Relationship Managers handling Trade Transactions
- Trade Operations Teams
- AML/CFT Professionals
- Internal Audit Officers



Shabnam Minhas brings 25+ years of banking leadership building inclusive teams across ABN Amro, RBS, Faysal Bank, and Citi Bank. An MBA Gold Medalist from IBA and founder of VisionHer, she advocates for women's advancement in leadership and conducts programs on building high-performing diverse teams.