



Review Petition No. PPRA/RP-03/2026
Government of Pakistan
Public Procurement Regulatory Authority
(Appeal & Review Petition Secretariat)
1st Floor, FBC Building, G-5/2, Islamabad

ORDER

M/s Ahsan Engineering Works

...the "Petitioner"

Vs.

Pakistan Petroleum Limited

...the "Respondent"

<u>Date of Hearing</u>	<i>Barrister Ali Hamza Malik</i>
17.06.2026	<i>(On behalf of the Appellant)</i>
	<i>Mr. Noman A. Farooqi (ASC), Miss Amr Taimur Azam Khan (Advocate)</i>
	<i>(On behalf of the Respondent)</i>

**REVIEW PETITION UNDER RULE 19(3) OF THE PUBLIC PROCUREMENT
RULES, 2004**

The Authority received a Review Petition filed by M/s Ahsan Engineering Works, through its proprietor Mr. Muhammad Irfan on 15.04.2026, under Rule 19(3) of the Public Procurement Rules, 2004. The Authority on receipt of the Review Petition issued notices to M/s Ahsan Engineering Works, through its proprietor Mr. Muhammad Irfan (the Appellant); and Pakistan Petroleum Limited (the Respondent) wherein it was directed to appear in person or through their nominated representatives or Counsel before the Authority on

17.06.2026 before the Review Petition Committee in the Committee Room of Public Procurement Regulatory Authority (PPRA).

2. On the said date of hearing (17.06.2026), the above-mentioned learned counsels for the parties appeared before the Committee and presented their arguments at length. The Respondents provided written arguments to the Committee.

3. The counsel for the Petitioner submitted that the impugned order was passed on 02-04-2026 and the present Review Petition is being filed within the prescribed limitation period of thirty (30) days; hence, the same is within time. The Petitioner has maintained a longstanding professional association with Pakistan Petroleum Limited since the year 2010, during which it has rendered services at various sites across Pakistan for over sixteen (16) years. Throughout this period, the Petitioner has consistently performed its contractual obligations to the satisfaction of the Respondent and has successfully executed numerous contracts without any complaint or adverse record.

4. The counsel for the Petitioner submitted that the Petitioner participated in RFQ No. 31622 titled "Support Services for Murree Guest House and PPL Regional Office Islamabad" and duly submitted its bid documents in accordance with the bidding requirements. The Respondent,

vide email dated 04-11-2025, required the Petitioner to furnish proof of registration with EOBI for a minimum of three years along with supporting documents under Clause 1.2.23. The Petitioner complied in good faith and submitted the requisite EOBI documents as available at the time. That subsequently, vide email dated 21-01-2026, the Respondent issued a show cause notice alleging that the EOBI registration certificate submitted by the Petitioner was forged/fake/non-genuine. That immediately upon receiving such allegation, the Petitioner approached the concerned office of EOBI, where it transpired that the discrepancy had occurred due to internal error/mismanagement at EOBI's end. The Petitioner, without delay, obtained a corrected and valid certificate and submitted the same to the Respondent.

5. The counsel for the Petitioner further submitted that despite submission of the valid certificate and a detailed explanation, the Respondent proceeded to fix a personal hearing. Due to unavoidable circumstances, the Petitioner's authorized representative appeared and fully explained the factual position. That the Respondent failed to apply its mind to the reply and documentary evidence furnished by the Petitioner and proceeded to pass the impugned order dated 02-04-2026, in a mechanical, arbitrary and non-speaking manner, without addressing the core defence raised by the Petitioner.

6. The counsel for the Petitioner contended that the entire proceedings conducted by the Respondent were merely perfunctory and designed to give a semblance of compliance, whereas in substance the Petitioner was condemned unheard, in violation of settled principles of law. The allegation of forgery is wholly misconceived, as there is no evidence to establish that the Petitioner fabricated the document or had any fraudulent intent. The essential ingredients of forgery, including intent to deceive or cause wrongful loss, are completely absent. That any discrepancy in the certificate originated from the issuing authority (EOBI) and not from the Petitioner. The Petitioner acted bona fide and rectified the issue immediately upon knowledge. The impugned order has been passed in violation of the well-established principle of fair trial, as neither the explanation nor documentary evidence submitted by the Petitioner was meaningfully considered. The impugned order is a non-speaking order, devoid of reasoning, and fails to address the defence raised by the Petitioner, rendering it legally unsustainable. The Respondent has gravely erred in law and on facts in holding that the alleged submission of a forged EOBI certificate amounted to "misrepresentation" and that the same was "not denied" during the personal hearing, thereby attracting the definition of fraudulent practice under the Public Procurement Rules, 2004.

7. The counsel for the Petitioner averred that the Petitioner never admitted, either expressly or impliedly, that it had submitted any forged or fabricated document. On the contrary, it was consistently maintained, both in the written reply and during personal hearing, that any discrepancy in the EOBI certificate was attributable to the issuing authority and not to any act or omission on part of the Petitioner. Further submitted that the Respondent has misread and mis-recorded the proceedings of the personal hearing. The Petitioner's representative had specifically rebutted the allegation of forgery and explained the circumstances under which the corrected certificate was obtained and submitted. Even otherwise, the essential ingredients of "misrepresentation" or "fraudulent practice," particularly mens rea and intent to deceive, are completely absent. A bona fide submission of a document, later found to contain an error attributable to a third-party statutory body, cannot be equated with fraud.

8. The counsel for the Petitioner further submitted that the Respondent has failed to conduct any independent verification or inquiry to establish that the Petitioner was responsible for the alleged forgery, and has instead proceeded on conjectures and assumptions. The mere existence of a defective or disputed document does not ipso facto constitute "fraudulent practice" unless it is proved that the bidder knowingly and intentionally engaged in deception to influence

the procurement process. The impugned conclusion is thus based on misapprehension of facts, non-reading of material evidence, and incorrect application of law, rendering the finding perverse and unsustainable.

9. The counsel for the Petitioner further submitted that his father, through his proprietorship concern M/s Gul Traders, has been continuously working with the Respondent since 1987. However, due to extraneous considerations and undisclosed reasons, the current management of the Respondent has embarked upon a course of victimization by systematically terminating contracts of the said concern and disqualifying it from participation in tenders. As a consequence of such hostile and discriminatory treatment, the present Petitioner being related to the said concern is also being unfairly targeted, without any lawful justification. The adverse action against the Petitioner is not based on any proven misconduct but is rather a continuation of the Respondent's mala fide intent to sideline entities associated with the Petitioner's family, which renders the impugned order legally unsustainable. Even if, without conceding, any discrepancy existed in the submitted document, the same was promptly rectified and was attributable to a third-party statutory body (EOBI). The extreme penalty-imposed amounting to disqualification and stigma is wholly disproportionate and shocks the conscience.

10. The counsel for the Petitioner further submitted that the Respondent has acted in violation of Articles 4, 18, and 25 of the Constitution of the Islamic Republic of Pakistan, 1973, which guarantee due process, freedom of trade/business, and equality before law. The arbitrary disqualification of the Petitioner, without lawful basis, amounts to infringement of these fundamental rights. The impugned order suffers from legal malice (malice in law) as the authority has exercised its powers for an unauthorized purpose and on irrelevant considerations, thereby vitiating the entire decision-making process. The impugned action defeats the fundamental principles of transparency, fairness, competition, and value for money underlying the Public Procurement Rules, 2004. That unless the present Review Petition is granted the interest of Petitioner shall be seriously prejudiced and they shall suffer irreparable loss, harm and injury.

11. The counsel for the Respondent, i.e., Pakistan Petroleum Limited (PPL) submitted that PPL floated a tender bearing RFQ No. 31622 titled "Support Services for Muree Guest House and PPL Regional Office Islamabad" (hereinafter "RFQ 31622"), duly published and advertised in accordance with the Public Procurement Rules, 2004 (hereinafter "PPRA Rules"). The bid closing date was 30.10.2025. Three (03) bidders submitted their bids, including:

(a). M/s. Ahsan Engineering Works;

(b). M/s. Contractor Akbar Ali & Co. (Pvt.) Limited;
and

(c). M/s. Western Global Services (Pvt.) Limited.

12. Further submitted that during the Technical Evaluation ("TE") stage, on 04.11.2025, PPL sent a message through its e-Procurement portal to the Petitioner requesting submission of the following documents as per RFQ 31622 requirements:

(a). SECP and NTN certificates evidencing at least 5 years of establishment (Clause 1.2.1);

(b). Proof of EOBI registration as an employer for a minimum of 3 years including a valid registration number, certificate and latest payment receipt (Clause 1.2.23);

(c). Registration with ESSi for at least 3 years with valid certificate and latest payment receipt (Clause 1.2.25); and

(d). Sworn affidavit confirming no litigation, blacklisting, or embargoes (Clauses 1.6.2, 1.6.3, and 1.6.4). The deadline for submission was 07.11.2025.

13. Further submitted that on 04.11.2025, the Petitioner, through its Proprietor Muhammad Irfan, submitted the EOBI "Application for Registration Form" along with other documents. The forged EOBI Document was submitted by the Petitioner on 11.11.2025. The Petitioner also submitted other documents including SESSI notifications, SESSI registration,

a sworn affidavit, and a new NTN certificate. It is pertinent to note that the Petitioner, in its message, acknowledged that some documents "which we don't have are already applied and we undertake to submit later."

Verification of EOBI Certificate and Discovery of Forgery

14. The counsel for the Respondent further submitted that PPL., in the discharge of its due diligence obligations under applicable procurement rules and policies, wrote a letter dated 15.12.2025 to the Chairman/Deputy Director General, Employees' Old-Age Benefits Institution ("EOBI"), Head Office, Karachi, requesting verification of the EOBI registration certificates submitted by all three participating bidders, including the Petitioner. This verification was a standard compliance requirement applicable to all bidders without discrimination. That on 12.01.2026, EOBI's B&C Department (through its Assistant Director B&C-I, Baber Rehman) responded to PPL's verification request. The EOBI's response, issued with the approval of the Chairman, EOBI, categorically confirmed that:

(a) M/s. Ahsan Engineering Works is not registered with Registration Number AAD06984. The said registration number is associated with a different entity, namely M/s. Modherbs Karachi, located at C-596+9, Ahsanabad Coop Housing Society, Phase-II, Karachi, with regular contribution status. The Petitioner had thus submitted a Certificate of Registration that bore a registration number belonging to another employer/establishment,

thereby rendering the EOBI certificate submitted by the Petitioner to be forged/fake/non-genuine.

Procurement Committee Approval for Technical Non-Compliance and Initiation of Blacklisting

15. Further submitted that on 14.01.2026, PPL presented the matter to its Procurement Committee ("PC") for Technical Evaluation approval and for seeking authorization to initiate blacklisting proceedings against the Petitioner. The Procurement Committee, after careful review, on 16.01.2026, approved:

(a). the Technical Evaluation conducted by Corporate Services (Islamabad Office), declaring the Petitioner's bid as Technically Non-Compliant; and

(b). initiation of formal blacklisting proceedings against M/s. Ahsan Engineering Works under PPRA Rule 19 and PPL's Blacklisting Mechanism.

Show Cause Notice and Opportunity of Hearing

16. Further added that on 21.01.2026, PPL issued a formal Show Cause Notice to the Petitioner under Rule 19 of the PPRA Rules 2004 and the Regulations on Mechanism for Blacklisting and Debarment of Bidders or Contractors Regulations 2024, calling upon the Petitioner to:

(a). submit a written response by 28.01.2026; and

(b). appear before the relevant Committee at a personal hearing on 03.02.2026.

17. The counsel for the Respondent further submitted that on 28.01.2026, the Petitioner submitted a message on the

e-Procurement portal stating inability to attend the hearing and attaching a new EOBI certificate bearing Registration Number AIG0301, dated 26.01.2026, obtained barely two days before the response deadline, which was a freshly registered certificate, entirely different from the certificate originally submitted during the bid. Notably, the Petitioner's written response did not deny the submission of the original forged certificate, nor did it provide any cogent explanation for how or why the submitted EOBI certificate bore the registration number of a third-party entity. That on 31.01.2026, the Petitioner sent another message through the e-Procurement portal inquiring about its technical qualification status and requesting to be informed whether it was eligible for the Commercial Response. The Petitioner also reiterated difficulty in personally attending hearings. That on 02.02.2026, PPL sent a message to the Petitioner advising that the Show Cause Notice had been issued on 21.01.2026 requiring response by 28.01.2026 and personal hearing on 03.02.2026, and granting a final and last opportunity to appear in a personal hearing on 10.02.2026 (subsequently rescheduled to 11.02.2026), failing which an appropriate decision would be taken in accordance with the bid documents and PPRA laws.

18. The counsel for the Respondent contended that on 11.02.2026, a personal hearing was duly conducted before PPL's Procurement Committee wherein Mr. Hamid Ahmed

(Manager of M/s. Ahsan Engineering Works) attended as the Petitioner's representative. During the hearing, Mr. Hamid Ahmed:

(a). submitted the same written response as had been submitted on 28th January 2026; and critically

(b). agreed and accepted that the EOBI certificate declared as forged had been erroneously submitted by them on PPL's e-Procurement portal (Tejari). The Petitioner's representative was given a full opportunity to present any additional information or clarification to the Committee, but no satisfactory explanation was furnished.

Decision of PPL's Procurement Committee and Blacklisting Order

19. The counsel for the Respondent further submitted that on 02.04.2026, PPL's Procurement Committee, after thorough deliberation and careful consideration of all relevant facts, approved the blacklisting of M/s. Ahsan Engineering Works for a period of four (4) years. The grounds for blacklisting were:

(a) the Petitioner had submitted a forged/fake/non-genuine EOBI registration certificate;

(b) the submission of forged documents constitutes misrepresentation and falls within the ambit of fraudulent practices under applicable PPRA Rules; and

(c) the misrepresentation was not denied during the personal hearing. On the contrary, it was acknowledged.

20. Further added that on 02.04.2026, PPL issued the formal Blacklisting Letter to the Petitioner declaring M/s. Ahsan Engineering Works and its directors blacklisted for a

period of 4 years, effective from that date, from all PPL's existing and upcoming bidding processes at all PPL locations/fields. On the same date, in compliance with PPRA Rule 19(2), PPL submitted the complete blacklisting proceedings to PPRA for onward action. That on 20.04.2026, PPRA received the instant Review Petition filed by the Petitioner under Rule 19(3) of the PPRA Rules 2004, which is now before this Honorable Authority.

21. The counsel for the Respondent further submitted that at the outset it may please be appreciated that the Petitioner's authorized representative, Mr. Hamid Ahmed, unequivocally and without qualification admitted during the personal hearing held on 11.02.2026 that the forged EOBI certificate was submitted by the Petitioner on PPL's e-Procurement portal. This admission constitutes conclusive and binding evidence against the Petitioner. A party cannot, having made a clear and unequivocal admission before a duly constituted Committee, thereafter, seek to resile from such admission through a Review Petition before this Honorable Authority. The entire edifice of the Review Petition is built upon the untenable premise that the certificate discrepancy was attributable to EOBI's internal error, a defence that was not credibly established before the Committee and which is contradicted by the Petitioner's own representative's admission. That Rule 19(3) of the PPRA Rules provides a

mechanism for Review Petitions before this Honorable Authority. A Review Petition is not an appeal on merits but is a supervisory remedy available only in cases of procedural illegality, jurisdictional error, or clear violation of the PPRA Rules by the procuring agency. The Petitioner has not demonstrated any such procedural infirmity.

22. Further submitted that PPL issued a duly compliant Show Cause Notice in terms of Rule 19 of the PPRA Rules; afforded the Petitioner opportunity to submit written response; offered multiple opportunities for personal hearing and conducted a personal hearing before a duly constituted Committee; and passed a speaking order based on the facts established before it, including the Petitioner's own admission. There is no procedural illegality, no jurisdictional error, and no violation of PPRA Rules that could sustain a Review Petition.

23. Further added that the grounds now raised in the Review Petition, that the discrepancy was due to EOBI's internal mismanagement, that the Petitioner acted in good faith, that there was no fraudulent intent, and allegations of mala fide and victimization against PPL, were not substantiated with any cogent evidence before the blacklisting committee. A party cannot introduce new facts, grounds, or documentary evidence before a Review Authority that were not established before the original decision-making body. The Petitioner has produced no contemporaneous document, correspondence, or

evidence to show that it raised the issue of EOBI's internal error with EOBI before the proceedings or before the Committee, beyond belatedly obtaining a different certificate after the Show Cause Notice was issued. The Petitioner has made sweeping and unsubstantiated allegations of victimization, mala fide, and discriminatory treatment by PPL's current management. It is settled law that mala fide must be established by positive, specific, cogent, and compelling evidence. Mere allegations or insinuations, particularly involving alleged grievances of a related proprietorship concern (M/s. Gul Traders), do not establish mala fide against a corporate entity undertaking a standard verification exercise that was applied uniformly and equally to all three participating bidders. The verification of EOBI registration was not targeted at the Petitioner alone; it was conducted for all bidders. EOBI's response confirming the discrepancy is an objective, third-party official confirmation, not a PPL generated finding.

24. Further submitted that the Petitioner participated in the blacklisting proceedings without challenging their legality or raising any procedural objection. The Petitioner appeared through its authorized representative, submitted written responses, and actively engaged with the Committee. Having voluntarily participated in the proceedings and availed the opportunity of a personal hearing, the Petitioner is estopped

from now challenging the procedural validity of those very proceedings through a Review Petition.

25. The counsel for the Respondent averred that the jurisdiction of this Honorable Authority is supervisory and is circumscribed by the PPRA Rules. This Honorable Authority does not sit as an appellate authority with plenary power to substitute its own assessment of facts for that of the procuring agency, where the procuring agency has acted within its lawful mandate, complied with procedural requirements, and based its decision on factual findings including the Petitioner's own admission. Further submitted that the Answering Respondent does not challenge the limitation aspect of the Review Petition at this stage; but reserves all rights in this regard. The fact that the Petition is within limitation does not cure its substantive defects.

26. The Petitioner's prior satisfactory performance, while acknowledged, is entirely irrelevant to the question of whether it submitted a forged certificate in RFQ 31622. The law does not recognize a doctrine of "accumulated goodwill" as a defence to the proven submission of fraudulent documents. PPL's decision to initiate blacklisting proceedings was triggered entirely and exclusively by the objective finding, confirmed by EOBI in its official correspondence dated 12.01.2026, that the EOBI certificate submitted by the Petitioner bore the registration number of a completely different entity. This

finding was made after verification of the certificates of all three participating bidders, not solely the Petitioner's. No mala fide or extraneous consideration played any role whatsoever in this process.

27. Further added that while the Petitioner claims to have submitted documents "in accordance with the bidding requirements", the critical fact is that the EOBI certificate submitted by the Petitioner was verified by EOBI itself to be forged/fake/non-genuine, in that it bore the Registration Number (AAD06984) of a third-party entity (M/s. Modherbs Karachi) and not of the Petitioner. Submission of correct and genuine documents is not optional; it is a mandatory requirement. The Petitioner's claim of having acted in accordance with bidding requirements is directly contradicted by EOBI's official verification. Further submitted that PPL, on 04.11.2025, requested the Petitioner to furnish proof of EOBI registration for a minimum of three years under Clause 1.2.23 of the bid document. This was a standard requirement applicable uniformly to all bidders. The Petitioner's submission in response to this requirement contained a certificate (EOBI Reg. No. AAD06984) that subsequently turned out, upon EOBI's own verification, to not belong to the Petitioner's firm.

28. Further added that good faith is not a defence to the submission of a document that is not what it purports to be. The EOBI certificate submitted by the Petitioner bore the

registration number (AAD06984) of a different entity. Whether the Petitioner was aware of this discrepancy or not, the document was factually inaccurate and non-genuine. Moreover, the submission that the certificate was "available at the time" raises the question of how the Petitioner came to possess an EOBI certificate bearing the registration number of a third-party entity. No explanation has ever been provided for this critical factual gap. The Notice was issued lawfully and was fully compliant with Rule 19 of the PPRA Rules 2004 and the Regulations on Mechanism for Blacklisting and Debarment of Bidders or Contractors Regulations 2024. The Show Cause Notice afforded the Petitioner a full and adequate opportunity to explain the discrepancy and to appear before the Committee at a personal hearing. The submission in the Review Petition that the Notice alleged the certificate to be "forged/fake/non-genuine" is a correct characterization of the Show Cause Notice. Further submitted that the contents of Para 9 of the Appeal, to the effect that the Petitioner "immediately upon receiving such allegation" approached EOBI and that it "transpired that the discrepancy had occurred due to internal error/mismanagement at EOBI's end", and that the Petitioner obtained a "corrected and valid certificate", are denied and require the following specific observations:

- (a). The Petitioner's claim that EOBI's internal error caused the discrepancy is entirely self-serving and unsubstantiated. There is no document, letter, or

official communication from EOBI acknowledging any internal error or mismanagement. The Petitioner has not produced any such document before the Blacklisting Committee or before this Honorable Authority.

(b). The second EOBI certificate obtained by the Petitioner and submitted with its response dated 28th January 2026 bore a completely different Registration Number (AIG0301) and a fresh registration date of 26.01.2026, i.e., obtained after the Show Cause Notice was issued. This is not a "corrected" certificate of the same registration; it is an altogether new registration, which itself raises serious questions.

(c). The original certificate submitted during the bid bore Reg. No. AAD06984 and purported to show a registration date of 26.09.2022, a registration that EOBI confirmed belongs to a different entity. No "correction" of an erroneously issued certificate has been demonstrated or evidenced. EOBI's official response to PPL made no mention of any internal error; it simply confirmed the mismatch between the name submitted and the registration number.

(d). Most critically, the Petitioner's own authorized representative, Mr. Hamid Ahmed, during the personal hearing on 11.02.2026, did not assert EOBI's internal error as the cause. He instead acknowledged, as recorded in PPL's PC approval documentation, that the certificate had been erroneously submitted by them on PPL's eProcurement portal (Tejari). This admission is fundamentally inconsistent with the Petitioner's current narrative of EOBI's internal mismanagement.

29. Further submitted that the record clearly establishes that the Petitioner's representative appeared at the hearing, was provided a full opportunity to present his case, submitted the same written response, and when pressed, conceded that the forged certificate had been erroneously submitted. The

claim that "unavoidable circumstances" prevented the Proprietor from attending is noted, but it is equally noted that the Petitioner was given two successive hearing opportunities, 3rd February and 11th February 2026, and ultimately did send a representative. Further contended that the blacklisting order dated 2nd April 2026 and the supporting PC Approval document set out in detail:

- (a). the fact of the submission of a forged EOBI certificate;
- (b). EOBI's official verification confirming the certificate was not registered in the Petitioner's name;
- (c). the issuance of Show Cause Notice and its service on the Petitioner;
- (d). the Petitioner's written response;
- (e). the conduct of the personal hearing;
- (f). the Petitioner's representative's attendance;
- (g). the representative's acknowledgment that the certificate was erroneously submitted; and
- (h). the Committee's reasoned conclusion. This is a fully considered and reasoned decision, not a mechanical or non-speaking order.

30. Further submitted that the term "forged/fake/non-genuine" as used in the PPRA Rules and PPL's blacklisting mechanism encompasses the submission of a document that misrepresents a material fact, including a document that bears credentials (registration number, registration date) belonging to a third party. Whether the Petitioner physically tampered with the certificate or obtained it from EOBI in its present form without verifying its accuracy, the act of submitting a certificate representing that Ahsan Engineering Works held EOBI Registration No. AAD06984, when EOBI has confirmed

that this number belongs to another entity, constitutes misrepresentation.

31. Further submitted that the Petitioner's reliance on the absence of *mens rea* or fraudulent intent misapprehends the nature of the violation. The PPRA Rules and blacklisting regulations are regulatory in nature and do not require proof of subjective criminal intent. Blacklisting is an administrative and regulatory sanction, not a criminal penalty, and the standard for its imposition is the objective fact of submission of a non-genuine/misrepresenting document, which is established beyond any doubt.

32. Furthermore, even if the Petitioner's argument of EOBI's internal error were accepted *arguendo* (which is denied), the Petitioner, as the bidder, bore the primary obligation to verify the authenticity of the documents it submitted. Submission of a document without verifying its accuracy does not constitute due diligence and cannot be offered as an exculpatory justification. The verification of EOBI certificates was conducted for all three bidders uniformly. EOBI's response was an independent, third-party official finding. The blacklisting proceedings were initiated on the basis of this objective, third-party confirmation. There is no basis, factual or legal, for the allegation of *mala fide*.

33. Further added that the period of blacklisting, four (4) years, is well within the maximum permissible period of ten

(10) years under the PPRA Rules. The Procurement Committee's decision to impose a four-year blacklisting was a reasoned and proportionate response to a serious violation: the submission of a non-genuine document in a public procurement process. The PPRA Rules specifically identify the submission of forged/fraudulent documents as a corrupt and fraudulent practice warranting blacklisting. The four-year period reflects a considered and calibrated judgment by the Committee, not an arbitrary or disproportionate decision.

34. Further submitted that PPL followed the prescribed procedure under Rule 19 of the PPRA Rules and the Blacklisting Regulations 2024, step by step. The proceedings were initiated on the basis of an objective, third-party verification by EOBI. The Petitioner was given due notice and multiple opportunities to respond. The Committee reached its decision based on the evidence before it, including the Petitioner's own admission. The submission that the proceedings were conducted with a predetermined mindset is entirely unsupported and is denied.

35. The Review Petition Committee heard the representatives of the Petitioner and the Respondent at considerable length and carefully examined the pleadings, the documents placed on record, the impugned blacklisting order dated 02.04.2026, the relevant provisions of the Public Procurement Rules, 2004, the Regulations on Mechanism for

Blacklisting and Debarment of Bidders or Contractors Regulations, 2024, and the comments furnished by the Employees' Old-Age Benefits Institution (EOBI).

36. In the instant Petition, the Petitioner assailed the Blacklisting order dated 02.04.2026 under Rule 19 (3) of the Public Procurement Rules, 2004. The said Rule is reproduced as under:

The bidder may file the review petition before the Authority within thirty days of communication of such blacklisting or barring action after depositing the prescribed fee and in accordance with procedure issued by the Authority, and the Authority shall evaluate the case and decide within ninety days of filing of review petition. The decision of the Authority shall be considered as final.

37. It is pertinent to state that the Authority (PPRA), vide its letter dated 18.06.2026, had requested the Employees' Old-Age Benefits Institution (EOBI) to examine the matter and furnish its comments and verification with respect to the following issues:

Whether the contents of EOBI's verification letter dated 12.01.2026 are accurate and continue to reflect the official record maintained by EOBI.

Whether the EOBI registration number previously quoted by the Petitioner was, at any point in time, associated with M/s Ahsan Engineering.

Whether any discrepancy in the registration record arose as a consequence of any internal administrative, clerical, or system-related error on the part of EOBI.

Whether the certificate annexed as Annex-B is genuine, valid, and duly issued by EOBI.

Whether Annex-B supersedes, rectifies, or otherwise replaces the certificate/document previously submitted by the Petitioner as Annex-C, and, if so, the circumstances and basis under which such supersession or rectification was affected.

Any other information, clarification, or record considered relevant by EOBI for the just, fair, and proper adjudication of the Review Petition.

38. In response to the aforesaid letter of the Authority, the Employees' Old-Age Benefits Institution (EOBI), vide its letter bearing No. HO/B&C-I/2026/34 dated 10.07.2026, furnished its comments and verification, and stated that according to the official record maintained by EOBI, Registration No. AAD06984 stands allotted to M/s Modherbs, Karachi, Pakistan, and the contents of EOBI's verification letter dated 12.01.2026 are correct, accurate, and continue to reflect the official record of the Institution. EOBI further categorically confirmed that the registration number previously quoted by the Petitioner has never, at any point in time, been associated with M/s Ahsan Engineering.

39. EOBI further stated that the registration certificate relied upon by the Petitioner is fake and that the assertions made by M/s Ahsan Engineering in this regard are wholly baseless and misleading. It was clarified that M/s Ahsan Engineering, bearing Registration No. AIG0301, was registered with EOBI on 26.01.2026 with an effective date of applicability of 01.09.2022. EOBI also clarified that the document annexed as Annex-B pertains to M/s Ahsan Engineering Works,

registered with its Regional Office, Kotri, whereas the certificate annexed as Annex-C pertains to M/s Modherbs, Karachi, Pakistan, bearing an entirely different registration number.

40. EOBI unequivocally stated that Annex-B and Annex-C relate to two distinct and separate entities; therefore, no question of supersession, rectification, or substitution of one certificate by the other arises. EOBI further categorically declared that the certificate enclosed as Annex-C is fabricated.

41. In terms of Rule 2(b*) "blacklisted" means a bidder that is declared by the Authority untrustworthy after establishing the fact that the bidder was found involved in any corrupt and fraudulent practice or practices; or if the bidder is declared incapable by the Authority due to its established performance failure during the execution of the contract; or if the bidder deviates from its prior commitment or declaration made regarding the bid or proposal submitted by the bidder.

42. In terms of Rule 19 "Blacklisting of suppliers and contractors" of the Public Procurement Rules, 2004, which states:

(1) The procuring agency shall devise a comprehensive mechanism for blacklisting and debarment of bidders for a specified time in accordance with regulations made by the Authority, and the bidder or the bidders shall be declared as-

(a) blacklisted and henceforth cross debarred for participation in any public procurement or disposal

proceedings for the period of not more than ten years, if corrupt and fraudulent practice as defined in these rules is established against the bidder or the bidders in pursuance of blacklisting proceedings.

43. In terms of Regulation 5 (a) "Reasons for Blacklisting and debarment" of the Regulations on "Mechanism for Blacklisting and Debarment of Bidders or Contractors Regulations, 2024", which states:

"If a procuring agency has sufficient reasons to believe that a bidder or contractor is involved in the corrupt and fraudulent practices as mentioned in Rule-2(f)(i) to (v) of the Public Procurement Rules, 2004, the Procuring agency shall blacklist and henceforth cross debar the bidder or contractor for participation in any public procurement or disposal proceedings for the period of not more than ten (10) years".

44. In terms of Regulation 7 "Initiation of proceedings by the Committee" of the Regulations on "Mechanism for Blacklisting and Debarment of Bidders or Contractors Regulations, 2024", which states:

(1) Within a period of ten (10) days after receiving the complaint of blacklisting or debarment from the respective sources, the Committee shall examine the complaint and issue show cause notice informing the bidder or contractor about the alleged charges and shall provide an opportunity to defend said charges.

(2) The show cause notice shall contain: - (a) precise allegation against the bidder or contractor; (b) the maximum period for which the procuring agency proposes to debar the bidder or contractor from participating in any public procurement; and (c) time limit for filing of response against the show cause notice.

45. At the outset, it is observed that the impugned order was communicated on 02.04.2026, whereas the present Review Petition was filed before the Authority on 15.04.2026. The Respondent has also not seriously disputed the aspect of limitation. Accordingly, the Review Petition is held to be within the prescribed limitation period under Rule 19(3) of the Public Procurement Rules, 2004, and is maintainable.

46. The principal controversy requiring determination is whether the Respondent acted in accordance with law while blacklisting the Petitioner for a period of four (04) years on account of submission of a forged/fake/non-genuine EOBI registration certificate during the procurement process.

47. The Petitioner has primarily contended that it had been associated with Pakistan Petroleum Limited for several years with an unblemished record; that any discrepancy in the EOBI certificate was attributable to an internal administrative error on the part of EOBI; that there was no fraudulent intent or *mens-rea* on the part of the Petitioner; that a valid certificate was subsequently obtained and furnished immediately upon knowledge of the discrepancy; that the proceedings were conducted in violation of the principles of natural justice; that the impugned order is non-speaking and arbitrary; and that the action of the Respondent is actuated by mala fide and victimization.

48. The Respondent, on the other hand, has maintained that the Petitioner submitted an EOBI registration certificate bearing Registration No. AAD06984, which, upon official verification from EOBI, was found to belong to another establishment, namely M/s Modherbs, Karachi. The Respondent has further submitted that due process under Rule 19 of the Public Procurement Rules, 2004, was fully observed by issuance of a show cause notice, affording the Petitioner sufficient opportunity to submit a written reply and personal hearing, and that the impugned order was passed only after considering the material available on record. It has further been asserted that during the personal hearing the Petitioner's representative admitted that the impugned certificate had been erroneously submitted by the Petitioner.

49. Since the Petitioner sought to attribute the discrepancy to an alleged internal error of EOBI, this Authority, in order to ascertain the factual position from the competent statutory authority, independently sought verification from EOBI vide letter dated 18.06.2026 on various aspects concerning the disputed registration certificate.

50. In response thereto, EOBI, vide its letter No. HO/B&C-I/2026/34 dated 10.07.2026, unequivocally confirmed that Registration No. AAD06984 has always been allotted to M/s Modherbs, Karachi, Pakistan, and has never at any point in time been associated with M/s Ahsan Engineering

Works. EOBI further categorically stated that the verification already furnished to PPL on 12.01.2026 was correct and continued to reflect its official record. More importantly, EOBI expressly declared that the certificate relied upon by the Petitioner was fake and fabricated. EOBI further clarified that M/s Ahsan Engineering Works was registered only on 26.01.2026 under Registration No. AIG0301 with an effective date of applicability of 01.09.2022, and that the subsequently issued certificate neither superseded nor rectified the earlier certificate, as both documents pertained to entirely different entities. Consequently, the Petitioner's plea that the discrepancy arose due to any clerical or administrative error on the part of EOBI stands completely negated by the categorical clarification furnished by EOBI itself.

51. The Review Petition Committee is of the considered view that the independent verification obtained directly from EOBI completely demolishes the foundation of the Petitioner's defence. The contention that the incorrect certificate resulted from an error committed by EOBI is unsupported by any contemporaneous documentary evidence and has been expressly contradicted by the issuing authority itself. Once the competent statutory authority has unequivocally declared that the impugned certificate is fabricated and that the registration number relied upon by the Petitioner never belonged to it, no

legal basis remains to accept the explanation advanced by the Petitioner.

52. The contention of the Petitioner that there was no fraudulent intention or *mens rea* also does not advance its case in the facts and circumstances of the present matter. Every bidder participating in a public procurement process bears the responsibility of ensuring that the documents submitted in support of its bid are genuine, authentic, and capable of verification. The procurement process is founded upon transparency, fairness, and equal treatment of all bidders. Submission of a fabricated or non-genuine document strikes at the very integrity of the procurement process irrespective of the Petitioner's previous business relationship with the procuring agency or subsequent attempts to obtain a fresh registration certificate after initiation of blacklisting proceedings.

53. Likewise, the submission that the Petitioner had satisfactorily executed contracts with the Respondent for several years cannot dilute or override the consequences flowing from submission of a fabricated document in the procurement process under consideration. Past performance cannot constitute a legal defence where the procurement process itself has been compromised through submission of a document which has subsequently been established by the issuing authority to be fake.

54. The allegation that the proceedings were conducted in violation of the principles of natural justice is also without substance. The record demonstrates that the Respondent issued a detailed show cause notice, invited a written explanation, granted more than one opportunity of personal hearing, and afforded the Petitioner adequate opportunity to explain its position before arriving at its decision. The Petitioner has not been able to establish any procedural illegality, denial of opportunity, jurisdictional defect, or violation of Rule 19 of the Public Procurement Rules, 2004, which may warrant interference by the Committee in exercise of its review jurisdiction.

55. Similarly, the allegations regarding mala fide, victimization, discrimination, and hostile treatment have remained bald assertions unsupported by any cogent or convincing evidence. Mere allegations, without substantive proof, cannot invalidate proceedings otherwise conducted in accordance with law, particularly where the action is founded upon independent verification by a third-party statutory authority.

56. The Review Petition Committee further observed that the Respondent's action is fully supported by the applicable legal framework. Rule 19(1)(a) of the Public Procurement Rules, 2004, expressly provides for blacklisting where corrupt and fraudulent practice is established against a bidder. Likewise,

Regulation 5(a) of the Regulations on Mechanism for Blacklisting and Debarment of Bidders or Contractors Regulations, 2024 authorizes blacklisting where sufficient reasons exist to believe that a bidder has engaged in corrupt or fraudulent practices contemplated under Rule 2(f) of the Public Procurement Rules, 2004. The material available on record, coupled with the conclusive verification furnished by EOBI, clearly justified initiation and culmination of blacklisting proceedings by the Respondent.

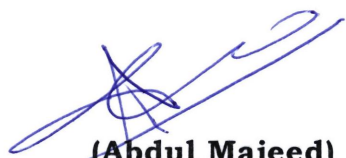
57. The period of blacklisting imposed by the Respondent is four (04) years, which is well within the maximum period of ten (10) years prescribed under Rule 19 of the Public Procurement Rules, 2004. Considering the seriousness of submission of a fabricated document in a public procurement process, the penalty imposed cannot be regarded as arbitrary, excessive, or disproportionate so as to warrant interference by this Authority.

58. In exercise of review jurisdiction under Rule 19(3) of the Public Procurement Rules, 2004, the Review Petition Committee is not required to substitute its own opinion for that of the procuring agency where the impugned proceedings have been conducted in accordance with law, due process has been observed, and the conclusions are supported by credible evidence. The Petitioner has failed to point out any procedural irregularity, jurisdictional error, violation of the Public

Procurement Rules, 2004, or patent illegality in the impugned blacklisting order that would justify interference by the Committee.

59. For the foregoing reasons, the Review Petition Committee finds no illegality, infirmity, or procedural impropriety in the blacklisting order dated 02.04.2026 passed by Pakistan Petroleum Limited. The findings recorded by the Respondent stand fully corroborated by the independent verification subsequently furnished by EOBI. Consequently, the present Review Petition is devoid of merit and is hereby **dismissed**. The blacklisting order dated 02.04.2026 is accordingly maintained. The Review Petition stands disposed of accordingly.


(Dr. Muhammad Aslam Waseem)
Director General (Legal)
(Member)


(Abdul Majeed)
Sr. Specialist (M&E)
(Member)


(Hasnat Ahmad Qureshi)
Managing Director (PPRA)
(Chairman of the Committee)

Dated: 20th July, 2026

Note: A copy of this order is being forwarded to Director-IT, PPRA, Islamabad for information.

Each page of the order has been signed by all members of the Appellate Committee. The order comprises of thirty-three (33) pages.