

SECURITIES & EXCHANGE COMMISSION OF PAKISTAN

Securities Market Division
Market Surveillance and Capital Issue Department

No. SMD/BOW/222/ 1 (201)/2012

February 8, 2012

The DGM Corporate Affairs,
First Capital Securities Corporation Limited,
103-C/II, Gulberg-III,
Lahore

Subject: Filing of Returns of Beneficial Ownership under Section 222 of the Companies Ordinance, 1984

Dear Sir.

This refers to the beneficial ownership of First Capital Securities Corporation Limited (**Beneficial Owner**) in Media Times Limited and Form-32 as at 17/10/2011 to 30/12/2011 filed by you on behalf of the Beneficial Owner.

- 2. In this regard, it is pointed out that pursuant to the provisions of Section 222 of the Companies Ordinance, 1984 ("Ordinance"), the Beneficial Owner was required to file the return of beneficial ownership for the sale transaction of 51,000 shares made on 17/10/2011 latest by 01/11/2011 while the same has been received in this office on 05/01/2012 with delay of 65 days.
- 3. In this connection, reference is made to this Commission's Notices dated 07/09/2009 and 21/09/2010 sent to directors, chief executives, managing agents, chief accountants, more than ten percent shareholders etc. of all listed companies. Through the said Notices attention of Beneficial Owners of the listed companies was invited to provisions of Section 222 of the Ordinance and were provided an opportunity to file their over due returns of beneficial ownership with Head Office of the Commission by 31/10/2009 and 31/10/2010 as well as were asked to ensure timely compliance of Section 222 of the Ordinance, in future. But despite the said notices/instructions by the Commission, the beneficial owner has filed the under reference return of beneficial ownership with aforesaid delay, which is a violation of Section 222 of the Ordinance.
- 4. However, I am directed to intimate you that on this occasion lenient view of the matter has been taken and the aforementioned return of beneficial ownership has been accepted. Further, the Beneficial Owner is strictly warned to ensure timely compliance of Section 222 of the Ordinance in future.

Yours truly,

(Muhammad Parooq)
Joint Director (BO)