

SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN COMMISSION SECRETARIAT

October 31, 2025

Circular No.29 of 2025

Subject: Clarification on the term 'Paid up capital' and 'Issued capital'

In exercise of powers conferred under section 282B(3) of the Companies Ordinance, 1984, (XLVII of 1984), read with sub-rule (3) of rule 24 of Voluntary Pension System Rules, 2005, Regulation 55 of the Non-Banking Finance Companies and Notified Entities Regulations, 2008 and Section 40B of the SECP Act, 1997, Securities and Exchange Commission of Pakistan hereby clarifies that the term 'paid-up capital' or 'issued capital', referred in the following, shall be read as 'number of outstanding shares',-

- i. Clause (e) of Circular No. 12 of 2021 dated April 06, 2021, under the heading of "Equity Sub-fund";
- ii. Schedule XIX, clause 3(a) of the Non-Banking Finance Companies and Notified Entities Regulations, 2008; and
- iii. Rule 8(10)(a)(i) of the Unit Linked Product and Fund Rules, 2015, in the corresponding exposure limits provided against "Equity securities of single entity".

Secretary to the Commission

Distribution:

- 1. Chief Executive Officers, Pension Fund Managers
- 2. Chief Executive Officers, All Asset Management Companies
- 3. Chief Executive Officers, Life Insurance Companies and Family Takaful Operators
- 4. Mutual Funds Association of Pakistan
- 5. Trustees of Pension Funds, Asset Management Companies and Life Insurance Companies/Family Takaful Operators