



No. SMD/Form-31/2014 – 329

April 14, 2014

Mr. Brendan Brady,  
Director,  
Pakistan Tobacco Company Limited,  
Silver Square, Plot No. 15,  
F-11 Markaz,  
Islamabad

**Subject: WARNING WITH RESPECT TO LATE FILING OF RETURN OF BENEFICIAL OWNERSHIP**

This refers to the return of beneficial ownership on Form-31, filed by you as a director/beneficial owner of Pakistan Tobacco Company Limited.

2. In this connection, attention is invited to Section 222 of the Companies Ordinance, 1984 which provides that, inter alia, a Director of a listed company is required to submit to the registrar and the Commission Form-31 containing the prescribed particulars pertaining to the beneficial ownership in the company and to notify on Form-32 the particulars of any change in the shareholding. Section 222(2) of the Ordinance prescribes the period within which the Form 31 is required to be submitted to the registrar and the Commission as under:-

*“in any other case, including a case where the company is listed on the stock exchange after the commencement of this Ordinance or after the person has occupied the position or office specified in sub-section (1) or has acquired interest as beneficial owner of securities as aforesaid, within thirty days of occupying the office in the company or acquisition of interest as beneficial owner requiring submission of the return aforesaid or listing of the company on the stock exchange, as the case may be”.*

3. Thus, you were required to file the aforementioned return of beneficial ownership with the Commission latest by 29/05/2013. But, the said return has been submitted on 13/11/2013 with delay of 168 days, in contravention of Section 222 of the Ordinance, which prima facie attracts penal provisions contain in Section 224(4) of the Ordinance.

4. However, I am directed to communicate that on this occasion, keeping in view your nominal shareholding, lenient view of the matter has been taken and the aforementioned return of beneficial ownership has been accepted. Further, you are strictly warned to ensure timely compliance of Section 222 of the Ordinance in future.

**(Muhammad Farooq)**  
Joint Director (BO)

C.C:

Company Secretary, Pakistan Tobacco Company Limited, Silver Square, Plot No. 15, F-11 Markaz, Islamabad, with the request to ensure compliance.