



**Securities and Exchange Commission of Pakistan**  
**Securities Market Division**  
**Market Supervision and Registration Department**

No. 1(11) FPRDMOD/MSW/SMD/2013

April 18, 2013

**The Chief Executive Officer,**  
Prudential Capital Management,  
Manager of First Prudential Modaraba,  
Mehrsons Estate, 1<sup>st</sup> Floor, Block – I,  
Talpur Road, Karachi.

**Subject: Warning with respect to the Violation of the Listing Regulations of the Karachi Stock Exchange (“KSE”)**

This is with reference to the announcement of half yearly results of the First Prudential Modaraba (“FPM”) managed by Prudential Capital Management Limited (“PCM”). The PCM in the announcement dated February 21, 2013 communicated that the meeting of the board of directors of PCM to consider half yearly accounts of the FPM shall be held on February 27, 2013. However, PCM vide letter dated February 27, 2013 communicated that the half yearly account of the FPM could not be finalized in the said meeting and shall now be finalized in the meeting to be held on February 28, 2013.

2. The KSE vide its letter dated March 5, 2013, communicated FPM that it has failed to fulfill the requirements as laid down under the Listing Regulations and the Correspondence Manual of the KSE, whereby FPM was required to communicate the financial results of the company immediately after the Board meeting. FPM was further required to explain the non-compliance and ensure submission of the half yearly results immediately.

3. In response FPM vide letter dated March 6, 2013 shared the half yearly results recommended by the board of directors of PCM, which was after three working days of the board meeting held on February 28, 2013. In this connection, please note that by not communicating the financial results of the FPM in a timely manner, PCM appears to be in violation of Regulation No. 16 of the Listing Regulations of the KSE and the requirements as laid down in the KSE Correspondence Manual.

4. It is the responsibility of every listed company to ensure compliance with all applicable rules and regulations and you being the Chief Executive of PCM have the prime responsibility to ensure it. However, the aforesaid violation shows sheer negligence on your part. It may be noted that the Securities and Exchange Ordinance, 1969 empowers the Commission to take punitive action in case of violation of any regulation made under it. However, taking a lenient view, on this occasion, a stringent warning is being issued with the instruction to ensure compliance with all the applicable rules and regulations in future.

**Imran Inayat Butt**  
Director/ HOD (MSRD)

CC:

- (i) The Managing Director, Karachi Stock Exchange Limited.
- (ii) The Registrar Modaraba, Securities and Exchange Commission of Pakistan