



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

No. 1 (01)/Wash/KSE/MSW/SMD/2009 / 79

Through Courier
August 31, 2012

The Chief Executive,
Excel Securities (Pvt.) Limited,
LG 1 & 2, Anees Plaza, 101-E, Blue Area,
Islamabad.
(051) 2273324-25

Subject: **WARNING WITH RESPECT TO WASH TRADES IN VARIOUS SCRIPS**

Dear Sir,

This is with reference to your letter dated July 26, 2012 in response to our letter of even number dated July 19, 2012 in respect of evidence for change of beneficial ownership of 198,244 shares of various scrips, pertaining to the trades in your propriety accounts maintained with two different brokerage houses namely; Pearl Securities Limited and Axis Global Limited.

2. In your reply, you have failed to provide sufficient justification for execution of the wash trades in your proprietary accounts.
3. Please note that the Code of Conduct set forth under the third schedule of the Brokers and Agents Registration Rules, 2001 ("the Rules"), makes it binding on the brokers of the exchanges to conduct their business with due diligence, care and skill failing which appropriate action can be taken against the broker under Rule 8 (a) and (b) of the Rules.
4. The execution of wash trades indicates that you ignored the provisions of the prevalent securities market law. However, keeping in view the fact that this was the first instance of wash trades in your propriety accounts, which was observed by the Commission, only a warning is being issued to you with advice to exercise due care and diligence while trading. Moreover, it is asserted that you must adopt a cautious approach while trading to ensure compliance of all the relevant rules and regulations and to avoid such misconduct in future failing which appropriate action will be taken against you.

Yours truly,

(Imran Inayat Butt)
Director /HOD (MSCID)

Copy to:

1. *Managing Director, Karachi Stock Exchange Limited, Karachi.*
2. *Managing Director, Islamabad Stock Exchange Limited, Islamabad.*
3. *CEO, Pearl Securities Limited, 137, Stock Exchange Building, Stock Exchange Road, Karachi*
4. *CEO, Axis Global Limited, Suite # 806, 8th Floor, Business & Finance Centre, I.I. Chundrigar Road, Karachi*