



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN  
 Securities Market Division  
 (Market Supervision & Registration Department)

Continuation Sheet - 9

listed company to the Stock Exchange(s), is also not acceptable as Regulation 16(1) requires that every listed company and issuer of a listed security shall advise and keep advised to the Exchange all decisions of its Board of Directors relating to cash dividend, bonus issue, right issue or any other entitlement or corporate action and any other price sensitive information in the manner notified by the Exchange from time to time. The said information is required to be communicated to the Exchange prior to its release to any other person or print / electronic media. (Emphasis added)

- (v) The explanation provided by the Authorized Representative regarding the heavy volume in the Scrip of the Respondent during the period of February 13, 2013 to February 19, 2013 that trading volume in the scrip after the announcement of dividend / bonus shares in February 2013, as pointed out by the Commission, was quite normal and even on lower side as compared with corresponding periods of last two years. The Authorized Representative also submitted that the increase in volumes of trading is simply attributable to declaration of dividends by Company which is quite understandable in view of historical data. In this regard, Authorized Representative was informed that the SCN issued to the Respondent under Section 22 of the Securities and Exchange Ordinance, 1969 for not complying the Listing Regulations made thereunder and the observation mentioned in the SCN with respect to heavy trading volume in the scrip was to cite the fact that the material information was extremely price sensitive and resulted in volatility in the Respondent's share price during the time of initial and subsequent announcements by the Respondent.

15. I am of the view that for efficient, fair and transparent market, two principles must apply: companies need to release relevant information as soon as it is available; and all the investors who want to deal in shares should have access to the same information at the same time. Moreover, for the protection of the investor's interest, a listed company must communicate information to shareholders and potential shareholders in such a way as to avoid the creation or continuation of a false market. Therefore, when an announcement is to be made, a company must take all reasonable care to ensure that any information it disseminate to the market is not