



To,  
Mr. Syed Usman Ali Shah,  
Management Executive,  
Securities Market Division,  
Marker Supervision Department,  
Securities and Exchange Commission of Pakistan.

**REPLY: SHARE PRICE OF AKD CAPITAL LIMITED ("AKDCL")**

Dear Sir,

We, M/s. AKD Capital Limited (hereinafter referred to as "Company") are in receipt of your (SECP) letter no. SMD/MSW/AKDCL/196/2015/2542 dated 20.01.2021 (hereinafter referred to as "Letter") wherein you had sought clarification from the Company in respect of the substantial increase in the share price of the Company over a short period of time. In view of the same, having considered the material on record we would like to address your concerns as under.

It is submitted that upon a perusal of the share price fluctuation, as is available on the PSX website, it has been observed that the share price has increased after publishing of a Notice on 21.12.2020 of the meeting of Board of Directors of the Company to update/ amend the Memorandum of Association of the Company which was followed by Notice of Material Information dated 29.12.2020 by the Company (hereinafter referred to as "Notice of Material Information") through which stakeholders were informed about Board of Directors of the Company resolution to update/ amend the Memorandum of Association and increase its authorized capital. Such disclosure, was followed by a Notice of Extraordinary General Meeting dated 04.01.2021 ("EOGM Notice") which has also been circulated to the stakeholders through newspaper both English & Urdu publication and transmitted to the PSX.

It is submitted that the Company has complied with all its disclosure obligations under Section 96 of the Securities Act, 2015, read with Clause 5.6.1 (a) and Clause 5.6.9 of the PSX Regulations and as such has duly notified, conveyed and disclosed all price sensitive information regarding the resolution of the Board of Directors of the Company to alter the memorandum and articles of association of the Company as well as increase its authorized capital.

In view of the above, it is most respectfully submitted that the Company has complied with its relevant obligations under the applicable laws and all information which may have caused such fluctuation in the share price of the Company has duly been disclosed.

We hope you find the above clarification in order and that it enables to you to close this matter at the earliest.

Yours Sincerely,

**M. Hammad Manzoor**  
Company Secretary

Cc: Chief Regulatory Officer  
Pakistan Stock Exchange Limited  
Pakistan Stock Exchange Building  
Stock Exchange Road, Karachi