



The Commissioner
Company Law Division and
Information System & Technology Division,
Securities and Exchange Commission of Pakistan
NIC Building, Jinnah Avenue
Islamabad.

Dear Sir,

Subject: Application for Extension in the Period of Holding of Annual General Meeting for FY 2021-22 and Laying of Accounts therein under Sections 132 & 223 read with Section 147 of the Companies Act, 2017

SECP vide its letter No. SMD/PRDD/Comp/(14)/2021/254 dated June 17, 2022 (copy enclosed) had granted SSGC exemption up to December 31, 2022 to convene the Annual General Meeting (AGM) for laying therein Financial Statements (FS) for FY 2020-21.

It may please be appreciated that SSGC operates in a Regulated Regime under the OGRA Ordinance, 2002 which require the Company to finalize its FS based on the Determination of Final Revenue Requirements (FRR) by OGRA. Since the FS of FY 2020-21 are not yet finalized due to the reason mentioned in the Table below, the Company is constrained to submit its FRR petition for FY 2021-22 to OGRA due to non-availability of audited opening balances of FS emanating from previous year i.e. June 30, 2021.

In view of the above, the application under Sections 132 & 223 of the Companies Act, 2017 is necessitated for seeking extension in holding the AGM for FY 2021-22 of the Company and laying of FS therein.

The particulars required under Rule 27(2) of the Companies (General Provisions and Forms) Regulations, 2018 are given hereunder:

1	The registration number, name and address of the company	Registration No. 0000760 Sui Southern Gas Company Limited, Registered Office: SSGC House ST-4/B, Block-14, Sir Shah Suleman Road, Gulshan-e-Iqbal, Karachi.
2	The date on which the last AGM, if any, was held and the financial year of which the financial statements were laid therein	The last AGM of the Company was held on 3 June 2022 and FS for the year ended 30 June 2020 were laid therein.
3	The date up to which the AGM is required to be held for the purposes of the said sections and the date up to which the	The AGM of the Company is required to be held on 28 October 2022 and the Audited FS for the year ended 30 June 2022 are required to be laid down before the Shareholders.



	financial statements are required to be laid therein	
4	Reasons for not being able to hold the AGM, or not laying the FS at the AGM by the date mentioned in clause (iii) and justification for extension in the period to the extent applied for; and	<p>Due to awaited OGRA decision on SSGCL Petition for Final Revenue Requirement (FRR) for the FY 2020-21 which has been submitted on July 06, 2022, audit of FS for FY 2020-21 cannot be completed.</p> <p>SSGC is unable to submit the Petition for FY 2021-22 due to non-availability of audited opening balances of accounts emanating from previous year i. e. June 30, 2021.</p> <p>The External Auditors have given the understanding that audit will be completed after getting OGRA decision on SSGCL Petition for FRR FY 2020-21. Then after finalization of audited FS, AGM would be held and the External Auditors for FY 2021-22 would be appointed who would start the audit and provide initialed accounts forming the basis for the Petition for FRR for FY 2021-22. Based on decision of FRR by OGRA, audit of FS would be concluded. Hence extension for AGM is sought till June 30, 2023.</p>
5	When the delay is attributed to non- completion of books of accounts or non-finalization of audit, the exact state of books of accounts with reasons for non-completion of such books or for non-finalization of the audit, as the case may be, such information being accompanied by a certificate of the company's auditor as to the state of its accounts, reasons for delay in completion of audit and the minimum time required for the purpose	Auditors for FY 2021-22 will be appointed in the AGM for FY 2020-21 as stated above.

Moreover, we would like to draw your attention on the sub-rule (1) of Rule 24 of the Public Sector Companies (Corporate Governance) Rules, 2013, which requires that every public sector company shall publish and circulate a Statement of Compliance along with its annual report to set out the status of its compliance with the Rules, and shall also file Statement of Compliance with the Commission and the Registrar concerned along with its annual report. Therefore, the Statement of Compliance for



the Year Ended June 30, 2022 under Rule 24 of the Public Sector Companies (Corporate Governance) Rules, 2013, will also be submitted along with Annual Report.

We are also enclosing herewith Affidavit duly signed by the Chief Financial Officer in original and Bank Challan dated 05.09.2022 paid on September 05, 2022 for Rs. 15,035/- in original, paid on account of application fee for extension in the date of holding of AGM for FY 2021-22.

It is respectfully prayed that the company may kindly be granted extension up to June 30, 2023 for holding of Annual General Meeting of the Company and laying of Audited Accounts of the Company for the year ended June 30, 2022 before the Shareholders of the Company.

Furthermore, due to above explained circumstances which are beyond the control of SSGCL, the finalization of quarterly / half yearly interim financial statements of the period concerned were also delayed. We would like to ensure that pending quarterly / half yearly interim financial statements will be finalized and circulated to the shareholders after finalization of FS and holding of AGM for FY 2020-21.

We will be obliged for giving favourable consideration to our request.

Thanking you,

Yours Sincerely,

Mateen Sadiq
Company Secretary

M. Amin Rajput
Chief Financial Officer

Enclosures

1. SECP Letter No. EMD/PRDD/Comp/(14)/2021/254 dated June 17, 2022
2. Certificate of the Company's Auditors.
3. Paid bank challan for Rs.15,035/- in original.
4. Affidavit of CFO.

CC:

1. The Registrar of Companies, Securities & Exchange Commission of Pakistan, State Life Building No. 2, Wallace Road, Karachi
2. The President, Pakistan Stock Exchange Limited, Stock Exchange Building, Stock Exchange Road, Off. I.I. Chandrigar Road, Karachi