



INDEPENDENT REASONABLE ASSURANCE REPORT ON THE STATEMENT OF FREE FLOAT OF SHARES

To the Chief Executive of M/s. Sindh Abadgar's Sugar Mills Limited

Introduction

We have been engaged to perform a reasonable assurance engagement on the annexed Statement of Free Float of Shares ('the Statement') of **M/s. Sindh Abadgar's Sugar Mills Limited** ('the Company') as of **December 31, 2023, March 31, 2024, and June 30, 2024, September 30, 2024.**

Applicable Criteria

The criteria against which the Statement is assessed is Regulation No. 5.7.2(b)(ii) of Pakistan Stock Exchange Limited Regulations ('PSX Regulations') which requires every listed company to submit directly to Pakistan Stock Exchange (PSX) an annual Free-Float Certificate duly verified by the auditor along with the annual audited accounts as prescribed under regulation 5.6.9(a) of the PSX Regulations.

Management's Responsibility for the Statements

Management is responsible for the preparation of the Statement as of December 31, 2023, March 31, 2024, June 30, 2024, and September 30, 2024, in accordance with the applicable criteria. This responsibility includes maintaining adequate records and internal controls as determined necessary to enable the preparation of the Statement such that it is free from material misstatement, whether due to fraud or error.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Chartered Accountants issued by the Institute of Chartered Accountants of Pakistan, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies the International Standard on Quality Control 1 "*Quality Control for firms that perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements*" and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our responsibility and summary of the work performed

Our responsibility is to carry out an independent reasonable assurance engagement and to express an opinion as to whether the Statement is prepared in accordance with the applicable criteria, based on the procedures we have performed and the evidence we have obtained.

We conducted our reasonable assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised), '*Assurance Engagements other than Audits or Reviews of Historical Financial Statements*' [ISAE 3000 (Revised)] issued by the International Auditing and Assurance Standards Board. That standard requires that we plan and perform this engagement to obtain reasonable level of assurance about whether the Statement is free from material misstatement.

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Our responsibility and summary of the work performed (continued)

A reasonable assurance engagement in accordance with the ISAE 3000 (Revised) involves performing procedures to obtain evidence about the free float of shares and related information in the Statement. The nature, timing and extent of procedures selected depend on the practitioner's judgment, including the assessment of the risks of material misstatement, whether due to fraud or error, in the Statement. In making those risk assessments, we considered internal control relevant to the Company's preparation of the Statement. A reasonable assurance engagement also includes assessing the applicable criteria used and significant estimates made by management, as well as, evaluating the overall presentation of the Statement.

We have carried out the procedures considered necessary for the purpose of providing reasonable assurance on the Statement. Our assurance procedures performed included verification of information in the Statement with the underlying data and record comprising of Central Depository Company statements, forms submitted by the Company with the Securities & Exchange Commission of Pakistan relating to its pattern of shareholding and other related information. Verification that the computation of free float of shares is in accordance with the PSX regulation also forms part of our assurance procedures.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Opinion

In our opinion, the Statement of Free Float of Shares as of December 30, 2023, March 31, 2024, June 30, 2024 and September 30, 2024 is prepared, in all material respects, in accordance with the PSX Regulations.

Restriction on use and distribution

This report is issued in relation to the requirements as stipulated under Regulation No 5.7.2(b)(ii) of the PSX Regulations and is not to be used or distributed for any other purpose. This report is restricted to the facts stated herein and the attachments.

Yours truly,

RAHMAN SARFARAZ RAHIM IQBAL RAFIQ
Chartered Accountants

Karachi

Date: December 19, 2024



Sindh Abadgar's Sugar Mills Limited

REF: SASM/CS/1237/2024

November 12, 2024

The General Manager
Pakistan Stock Exchange Limited,
Stock Exchange Building,
Stock Exchange Road,
Karachi.

SUB: Free – Float of Shares: Sindh Abadgar's Sugar Mills Ltd.

	Quarter-1	Quarter-2	Quarter-3	Quarter-4
	31-12-2023	31-03-2024	30-06-2024	30-09-2024
Total Outstanding Shares	10,425,000	10,425,000	10,425,000	10,425,000
Less: Government Holdings	-	-	-	-
Less: Shares held by Directors/Sponsors/Senior Management Officers and their associates	7,409,436	7,409,436	7,409,436	7,484,581
Less: Shares in Physical Form	1,499,062	1,497,802	1,495,802	1,495,802
Less: Shares held by Associate companies / Group Companies (Cross holdings)	-	-	-	-
Less: Shares issued under Employees Stock Option Schemes that cannot be sold in the open market in normal course	-	-	-	-
Less: Treasury shares	-	-	-	-
Less: Any other category that are barred from selling at the review date				
Free Float	1,516,502	1,517,762	1,519,762	1,444,617

Basis of Preparation: This Statement is prepared in accordance with the requirements of Regulation No. 5.7.2(b) (ii) of Pakistan Stock Exchange Limited Regulations (PSX Regulations).

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Company Secretary



Chief Executive

Note:

"Sponsors" has the same meaning as defined in The Repealed Companies (Issued of Capital) Rules, 1996.

"Senior Management Officers" and "Associates" have the same meaning as defined in the Securities Act, 2015.



Sindh Abadgar's Sugar Mills Limited

REF: SASM/GDF/01239/2024

November 12, 2024

Rahman Sarfaraz Rahim Iqbal
Rafiq Chartered Accountants
Plot No. 180, Block A
S. M. C.
H.S
Karachi.

**STATEMENT OF FREE FLOAT SHARES AS AT DECEMBER 31, 2023,
MARCH 31, 2024, JUNE 30, 2024, & SEPTEMBER 30, 2024**

Dear Sir(s)

This representation letter is provided in connection with your assurance engagement of the statement of free float shares of **M/s. Sindh Abadgar's Sugar Mills Limited** ("the Company") as at **December 31, 2023, March 31, 2024, June 30, 2024, and September 30, 2024** for the purpose of issuing an assurance report as to whether statement of free float shares as of December 31, 2023, March 31, 2024, June 30, 2024, and September 30, 2024 is prepared, in all material respects, in accordance with Pakistan Stock Exchange Limited Regulations.

We have made appropriate inquiries of directors and senior management officers of the Company with the relevant knowledge and experience. Accordingly, we confirm, to the best of our knowledge and belief, that there were no **shares held by Directors / Sponsors / Senior Management Officers and their associates** of the Company (within the meaning of these terms as defined in the Companies (Issue of Capital) Rules, 1996 and the Securities Act, 2015) as of December 31, 2023, March 31, 2024, June 30, 2024, and September 30, 2024 except as detailed in **Annexure 'A'** to this representation letter.

Yours truly,

Chief Executive Officer



Company Secretary

Encl.:

Annexure 'A' – Member wise details of shares held by Directors / Sponsors / Senior Management Officers and their associates as of December 31, 2023, March 31, 2024, June 30, 2024, and September 30, 2024



Sindh Abadgar's Sugar Mills Limited

Annexure 'A' – Member wise details of shares held by Directors / Sponsors / Senior Management Officers and their associates as of December 31, 2023, March 31, 2024 June 30, 2024, and September 30, 2024

S.No	MEMBER'S NAME	RELATIONSHIP OF MEMBERS WITH THE COMPANY	CNIC/NTN NUMBER	SHARES IN CDC / PHYSICAL FORM	31-Dec-23	31-Mar-24	30-Jun-24	30-Sep-24
1	DEOO MAL	DIRECTOR	42301-5915195-7	CDC	946,815	946,815	946,815	946,815
2	DILEEP KUMAR	DIRECTOR	41303-9544553-1	CDC	1,007,300	1,007,300	1,007,300	1,007,300
3	PEHLAJ RAI	DIRECTOR	41303-6266826-1	CDC	817,900	817,900	817,900	893,045
4	MOHAN LAL	DIRECTOR	41207-6936379-1	CDC	817,500	817,500	817,500	817,500
5	BESHAM KUMAR	DIRECTOR	42301-9760879-1	CDC	837,400	837,400	837,400	837,400
6	TARA CHAND	DIRECTOR	41303-0876086-5	CDC	725,600	725,600	725,600	725,600
7	MAHESH KUMAR	DIRECTOR	41308-4707018-3	CDC	744,100	744,100	744,100	744,100
8	ZAFAR AHMED GHORI	DIRECTOR	41304-8087251-5	CDC	500	500	500	500
9	MAHESHWARI	DIRECTOR	41302-2912177-6	CDC	500	500	500	500
10	MUHAMMAD SIDDIQ KHOKAR	DIRECTOR	42301-8846326-1	CDC	1	1	1	1
11	MUHAMMAD SIDDIQ KHOKAR	DIRECTOR	42301-8846326-1	CDC	55	55	55	55
12	JAGDESH KUMAR	RELATIVES	41207-9154175-7	CDC	790,000	790,000	790,000	790,000
13	HASSOMAL	RELATIVES	42301-5179912-3	CDC	721,765	721,765	721,765	721,765
GRAND TOTAL					7,409,436	7,409,436	7,409,436	7,484,581

