Government of Pakistan
Ministry of Commerce
Directorate General of Trade Organizations
(Office of Regulator of Trade Organizations)
State Life Building No. 7, 2nd Floor,
Jinnah Avenue, Blue Area,
Islamabad
*****

F. No: 6(28)/2026-TO

Islamabad, August 11th 2026

Secretary General, Multan Chamber of Commerce and Industry, Shahrah –e- Aiwan-e-Tijarat-o-Sanat, Multan.	**Members Election Commission** Multan Chamber of Commerce and Industry, Shahrah –e- Aiwan-e-Tijarat-o-Sanat, Multan.
Mr. Kamran Ahmad Awan M/s Pak Arab Fertilizer Khanewal Road, Multan	Mr. Basharat Hashmi M/s Fazal Farms Private Limited, 59/3, Abdali Road, Multan
Muhammad Asif M/s Hussain Mills Limited, Fazalabad Vehari Road, Multan	Mr. Basharat m/s Fazal Holding Private Limited, 59/3, Abdali Road, Multan
Mr. Basharat Hashmi M/s Hussain Ginneries Ltd. Mauza Khulang Janubi Shah Jamal, Jatoi Road, Multan	Mr. Basharat Hashmi M/s Zaffar Nasir Oil Extraction Ltd. 59/3, Abdali Road, Multan.
Mr. Kamran Ahmed Awan M/s Fatima Energy Plant Site Fazal Garh, Sanawan, Kot Addu, Muzaffar Garrh	Mian Aziz Ahmad Sheikh M/s Maqbool Textile Mills Ltd. Multan.

Subject:- **PERSONAL HEARING IN RESPECT OF APPEALS FILED BY MR. KAMRAN AHMAD AWAN AND 07 OTHERS AGAINST THE DECISION OF SECRETARY GENERAL AND ELECTION COMMISSION OF MULTAN CHAMBER OF COMMERCE AND INDUSTRY (SCCI) FOR THE ELECTIONS 2026-28.**

I am directed to refer to the subject cited above and to enclose herewith copy of 08 appeals filed by Mr. Kamran Ahmad Awan and 07 others against the decision of election commission of Multan CCI. The Regulator of Trade Organizations has been pleased to fix the matter for personal hearing on **18-08-2026 (Tuesday) at 2:30 p.m.** in his office located at State Life Building No. 7, 2nd Floor, Blue Area, Islamabad.

2. You are therefore, directed to appear before the Regulator of Trade Organizations for personal hearing on the specified date and time along with all the relevant record pertaining to the matter. Secretary General and Election Commission are further directed to submit views / comments on the subject appeals before the date of hearing. The Secretary General RYKCCI is further directed to provide all the relevant records of the members / voters on whom objections have been raised by the appellant.

Encl:- As above.

(Asadullah)
PS to Regulator (TOs)

pakarab
FERTILIZERS LIMITED

August 10, 2026

The Directorate General of Trade Organizations (DGTO)
2nd Floor, State Life Building No. 7, Blue Area (China Chowk)
Sector F-6/4
ISLAMABAD

Sub: **DECISION OF THE ELECTION COMMISSION OF THE MULTAN CHAMBER OF COMMERCE & INDUSTRY IN THE APPEAL FILED BY THE APPELLANT**

Respected Sir,

This is with reference to the letter dated August 3, 2026 concerning exclusion of the name of Pakarab Fertilizers Limited (the "Company" / "Appellant") from the voters' list and the subsequent appeal before the Election Commission, which upheld the rejection vide decision dated 07.08.2026 (Exhibit-B/1 & B/2). The Appellant respectfully submits that the impugned decision is contrary to Section 10(7) of the Trade Organizations Act, 2013, Rule 15 of the Trade Organizations Rules, 2013 and the relevant provisions of the Articles of Association of MCCI, for the reasons set out below.

GROUNDS OF APPEAL:
In this regard, we respectfully submit as under:

- The application form for membership was submitted on 12.03.2025 along with payment of dues to MCCI; accordingly, the membership certificate was issued.
- MCCI announced the election schedule for the 2026–2028 elections in July 2026, i.e. after completion of one full year from 01.07.2025.

LEGAL GROUNDS:

1. ***The Appellant independently satisfies Section 10(7) of the Trade Organizations Act, 2013:***

Section 10(7) provides that new members become eligible to vote on completion of two years of enrolment and payment of all dues, while its proviso specifically addresses old members whose membership has been discontinued due to non-payment of subscription dues and makes them eligible to vote on completion of one year of re-enrolment and payment of all dues. The Company is admittedly an old member of MCCI. Even if the position most favorable to MCCI is accepted — namely that the earlier membership stood discontinued and that the certificate dated 12.03.2025 represented re-enrolment — the Company had completed one full year of such re-enrolment by 01.07.2026, before announcement of the 2026–2028 election schedule. The statutory waiting period applicable to an old re-enrolled member was therefore already complete.

2. ***Rule 15 must be read subject to Section 10 of the Act, and the Appellant satisfies that combined statutory test:***

Rule 15(1) expressly makes voting eligibility subject to Section 10 of the Act. Rule 15(1)(a) requires the prescribed period of valid membership as on the date of announcement of the election schedule and contains a proviso for old members; Rule 15(1)(b) separately requires compliance with the membership and renewal conditions under Rule 11. The Company had paid its dues, had been issued a membership certificate on 28.02.2025 and, by the time the 2026 election schedule was announced, had completed more than one year after re-enrolment. Accordingly, even on MCCI's own characterization of the transaction as fresh/re-enrolment, the Company satisfies the statutory eligibility test applicable to an old member.

3. ***<u>The Islamabad High Court has expressly recognized the voting right of an old member after completion of one year following re-enrolment - a condition admittedly satisfied by the Company:</u>***

In Aftab Ahmed Barlas v. Director General of Trade Organization (2021 CLD 204), the Islamabad High Court considered the voting eligibility of an old member whose membership had been discontinued for non-payment of subscription and subsequently restored/re-enrolled. While construing Section 10(7) of the Trade Organizations Act, 2013 together with the applicable Rules, the Hon'ble Court held that such an old member becomes eligible to vote upon completion of one year after re-enrolment, subject to payment of the requisite dues.

Accordingly, once it is admitted that Pakarab Fertilizers Limited was an old member, had paid its outstanding dues, was re-enrolled no later than 12.03.2025, and had completed one year of such re-enrolment before the relevant election schedule, its eligibility to vote follows directly from the principle laid down by the Islamabad High Court. The very precedent which requires an old re-enrolled member to wait for one year consequently establishes the Company's right to vote once that one-year period has been completed.

The judgment, therefore, supports the present appeal. Even if MCCI's position is accepted in its entirety - namely, that the Company's earlier membership stood discontinued due to non-payment and that the membership certificate issued on 12.03.2025 constituted a fresh re-enrolment - the Company had admittedly completed one full year of such re-enrolment on 01.07.2026, before the announcement of the MCCI election schedule for the term 2026-2028. The statutory condition identified and enforced by the Islamabad High Court, therefore, stood fully satisfied in the Company's case.

4. ***<u>The Election Commission's approach fails to give effect to the special statutory treatment of an "Old Member":</u>***

The proviso to Section 10(7) exists precisely to deal with an old member whose membership was discontinued for non-payment and later renewed/re-enrolled. Such a member is not treated in the same manner as a person becoming a member for the first time. If the impugned decision requires the Company to complete a fresh two-year period from 28.02.2025 notwithstanding its status as an old member, it effectively renders the statutory proviso nugatory. The specific one-year rule for old re-enrolled members must be given effect.

5. ***<u>Article 47 of MCCI's Articles is consistent with restoration/re-enrolment of an old member and supports the application of the one-year rule:</u>***

Article 47, under the heading "*RESTORATION OF MEMBERSHIP*", provides for re-enrolment of a member whose name has been removed from the Register due to non-payment, upon payment of the prescribed admission fee afresh together with outstanding arrears. The Company's subsequent application and the membership certificate issued on 12.03.2025, therefore, fit the Articles' own concept of restoration/re-enrolment following non-payment. That characterization reinforces, rather than defeats, the Company's reliance on the special statutory rule for old members under Section 10(7).

6. ***Without prejudice, MCCI must also establish that cessation/removal under Article 46(iii) was lawfully effected:***

Article 46 specifically governs cessation of membership. In the case of non-payment, Article 46 C(iii) refers to failure to pay annual subscription or other dues by a date determined by the Executive Committee, despite notice for payment, and also recognizes the Executive Committee's power to extend time. Accordingly, if MCCI relies upon formal cessation/removal of the earlier membership, it should be required to produce the relevant Executive Committee decision fixing the payment date, the notice for payment, proof of service, any resolution/order recording cessation or removal, and the corresponding entry in the Register of Members. In the absence of such material, automatic and final cessation should not merely be presumed.

7. ***Article 46 and Article 47 must be read together, not in isolation:***

The Articles contemplate both cessation for specified causes and restoration/re-enrolment after removal for non-payment. Read together, they establish a structured mechanism dealing with an existing member who falls into arrears. They do not support treating such a person as an entirely unrelated first-time entrant for all purposes. At the very least, once restoration/re-enrolment took effect on 12.03.2025, the Company entered the statutory category of an old member re-enrolled after discontinuance, to whom the one-year voting rule applies.

8. ***Article 45 remains relevant as a supporting due-process provision, but the Appellant does not rest its case upon Article 45 alone:***

Article 45(c)(iii) provides procedural protection in cases of expulsion/withdrawal of membership rights for intentional violation of the Chamber's rules, regulations or by-laws. While non-payment is specifically dealt with by Article 46, Article 45 reinforces the broader scheme that serious adverse membership consequences are governed by the Articles and should not be inferred beyond their terms. The principal case of the Appellant, however, rests upon Section 10(7), Rule 15 and Articles 46–47.

9. ***MCCI's continued use of the same membership number confirms that the Company was re-enrolled as an existing/old member, not admitted as a new member for the first time:***

It is significant that upon re-enrolment MCCI issued the Company its membership certificate under the same membership/registration number that had been allotted to Pakarab Fertilizers Limited and used for its membership for many years prior to the temporary lapse in payment of annual subscription. MCCI did not allot the Company a new membership number upon its re-enrolment. Instead, it continued the Company's longstanding membership identity in its own records.

Accordingly, MCCI cannot reasonably treat the Company as a wholly new member for electoral purposes while simultaneously maintaining and recognizing the same membership number under which the Company had remained a member for many years. In any event, even if the re-enrolment dated 12.03.2025 is treated as commencing a fresh qualifying period, the Company had completed the requisite one year before announcement of the 2026 election schedule and was, therefore, eligible to vote under Section 10(7).

The continued use of the same membership number is, therefore, consistent with the Company's status as an "*Old Member*" whose membership had been discontinued due to non-payment and subsequently re-enrolled, within the meaning of Section 10(7) of the Trade Organizations Act, 2013. It further distinguishes the Company from a genuinely new member being enrolled with MCCI for the first time.

10. ***The impugned decision should be set aside because, on either legal route, exclusion from the 2026 voters' list is unsustainable:***

If MCCI establishes lawful discontinuance of the earlier membership, the Company nevertheless completed the one-year period following re-enrolment on 01.07.2026 and is eligible under the special rule applicable to old members. Alternatively, if MCCI cannot establish compliance with Article 46(iii) for cessation/removal, its premise of automatic discontinuance is itself open to challenge. On either approach, the Company's exclusion from the final voters' list requires reconsideration and the Appellant is entitled to the relief prayed for.

PRAYER:

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may kindly set aside the decision dated 07.08.2026 of the Election Commission and the underlying rejection of the Secretary General, MCCI, and direct that the name of Pakarab Fertilizers Limited be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028, thereby enabling the Company to exercise its lawful right to vote through its Authorized Representative. Without prejudice, if the Directorate considers further factual verification necessary, the Appellant respectfully requests that MCCI be directed to produce the Executive Committee resolution fixing the relevant payment date, notice(s) issued under Article 46(iii), proof of service, any cessation/removal resolution and the relevant Register of Members entries. The Appellant further requests an opportunity of personal hearing and permission to place its complete membership record, payment record, membership certificates and MCCI correspondence before the Directorate.

Best regards,
For & on behalf of Pakarab Fertilizers Limited

Kamran Ahmad Awan

Encl.: As above.

P.O. No 30591564 of Rs. 35,000/-
dated 10.08.2026

4

August 10, 2026

The Directorate General of Trade Organizations (DGTO)
2nd Floor, State Life Building No. 7, Blue Area (China Chowk)
Sector F-6/4
ISLAMABAD

Subject: DECISION OF THE ELECTION COMMISSION OF THE MULTAN CHAMBER OF COMMERCE & INDUSTRY IN THE APPEAL FILED BY THE APPELLANT

Respected Sir,

This is with reference to the letter dated August 3, 2026 concerning exclusion of the name of Fazal Farms (Pvt) Ltd (the "Company" / "Appellant") from the voters' list and the subsequent appeal before the Election Commission, which upheld the rejection vide decision dated 07.08.2026 (Exhibit-B/1 & B/2). The Appellant respectfully submits that the impugned decision is contrary to section 10(7) of the Trade Organizations Act, 2013, Rule 15 of the Trade Organizations Rules, 2013 and the relevant provisions of the Articles of Association of MCCI, for the reasons set out below.

GROUNDS OF APPEAL

In this regard, we respectfully submit as under:

MATERIAL CHRONOLOGY

For clarity, the material dates are not in dispute:

31.03.2025: The Company had not paid its annual membership dues for the year 2025 by 31 March 2025.

23.06.2025: The outstanding membership dues were paid to MCCI.

24.06.2025: At the direction/requirement of MCCI, an application for membership was submitted.

01.07.2025: MCCI issued a fresh membership certificate to the Company.

July 2026: MCCI announced the election schedule for the 2026–2028 elections, i.e. after completion of one full year from 01.07.2025.

LEGAL GROUNDS

1. The Appellant independently satisfies section 10(7) of the Trade Organizations Act, 2013.

Section 10(7) provides that new members become eligible to vote on completion of two years of enrolment and payment of all dues, while its proviso specifically addresses old members whose membership has been discontinued due to non-payment of subscription dues and makes them eligible to vote on completion of one year of re-enrolment and payment of all dues. The Company is admittedly an old member of MCCI. Even if the position most favourable to MCCI is accepted — namely that the earlier membership stood discontinued and that the certificate dated 01.07.2025 represented re-enrolment — the Company had completed one full year of such re-enrolment by 01.07.2026, before announcement of the 2026–2028 election schedule. The statutory waiting period applicable to an old re-enrolled member was therefore already complete.

2. Rule 15 must be read subject to section 10 of the Act, and the Appellant satisfies that combined statutory test.

Rule 15(1) expressly makes voting eligibility subject to section 10 of the Act. Rule 15(1)(a) requires the prescribed period of valid membership as on the date of announcement of the election schedule and contains a proviso for old members; Rule 15(1)(b) separately requires compliance with the membership and renewal conditions under Rule 11. The Company had paid its dues, had been issued a membership certificate on 01.07.2025 and, by the time the 2026 election schedule was announced, had completed more than one year after re-enrolment. Accordingly, even on MCCI's own characterization of the transaction as fresh/re-enrolment, the Company satisfies the statutory eligibility test applicable to an old member.

3. The Islamabad High Court has expressly recognized the voting right of an old member after completion of one year following re-enrolment - a condition admittedly satisfied by the Company.

In Aftab Ahmed Barlas v. Director General of Trade Organization (2021 CLD 204), the Islamabad High Court considered the voting eligibility of an old member whose membership had been discontinued for non-payment of subscription and subsequently restored/re-enrolled. While construing section 10(7) of the Trade Organizations Act, 2013 together with the applicable Rules, the Hon'ble Court held that such an old member becomes eligible to vote upon completion of one year after re-enrolment, subject to payment of the requisite dues.

Accordingly, once it is admitted that Fazal Farms (Pvt) Ltd was an old member, had paid its outstanding dues, was re-enrolled no later than 01.07.2025, and had completed one year of such re-enrolment before the relevant election schedule, its eligibility to vote follows directly from the principle laid down by the Islamabad High Court. The very precedent which requires an old re-enrolled member to wait for one year consequently establishes the Company's right to vote once that one-year period has been completed.

The judgment therefore supports the present appeal. Even if MCCI's position is accepted in its entirety - namely, that the Company's earlier membership stood discontinued due to non-payment and that the membership certificate issued on 01.07.2025 constituted a fresh re-enrolment - the Company had admittedly completed one full year of such re-enrolment on 01.07.2026, before the announcement of the MCCI election schedule for the term 2026-2028. The statutory condition identified and enforced by the Islamabad High Court therefore stood fully satisfied in the Company's case.

4. The Election Commission's approach fails to give effect to the special statutory treatment of an "old member".

The proviso to section 10(7) exists precisely to deal with an old member whose membership was discontinued for non-payment and later renewed/re-enrolled. Such a member is not treated in the same manner as a person becoming a member for the first time. If the impugned decision requires the Company to complete a fresh two-year period from 01.07.2025 notwithstanding its status as an old member, it effectively renders the statutory proviso nugatory. The specific one-year rule for old re-enrolled members must be given effect.

5. Article 47 of MCCI's Articles is consistent with restoration/re-enrolment of an old member and supports the application of the one-year rule.

Article 47, under the heading "RESTORATION OF MEMBERSHIP", provides for re-enrolment of a member whose name has been removed from the Register due to non-payment, upon payment of the prescribed admission fee afresh together with outstanding arrears. The Company's subsequent application and the membership certificate issued on 01.07.2025 therefore fit the Articles' own concept of restoration/re-enrolment following non-payment. That characterization reinforces, rather than defeats, the Company's reliance on the special statutory rule for old members under section 10(7).

6. Without prejudice, MCCI must also establish that cessation/removal under Article 46(iii) was lawfully effected.

Article 46 specifically governs cessation of membership. In the case of non-payment, Article 46 C(iii) refers to failure to pay annual subscription or other dues by a date determined by the Executive Committee, despite notice for payment, and also recognizes the Executive Committee's power to extend time. Accordingly, if MCCI relies upon formal cessation/removal of the earlier membership, it should be required to produce the relevant Executive Committee decision fixing the payment date, the notice for payment, proof of service, any resolution/order recording cessation or removal, and the corresponding entry in the Register of Members. In the absence of such material, automatic and final cessation should not merely be presumed.

7. Article 46 and Article 47 must be read together, not in isolation.

The Articles contemplate both cessation for specified causes and restoration/re-enrolment after removal for non-payment. Read together, they establish a structured mechanism dealing with an existing member who falls into arrears. They do not support treating such a person as an entirely unrelated first-time entrant for all purposes. At the very least, once restoration/re-enrolment took effect on 01.07.2025, the Company entered the statutory category of an old member re-enrolled after discontinuance, to whom the one-year voting rule applies.

8. Article 45 remains relevant as a supporting due-process provision, but the Appellant does not rest its case upon Article 45 alone.

Article 45(c)(iii) provides procedural protection in cases of expulsion/withdrawal of membership rights for intentional violation of the Chamber's rules, regulations or by-laws. While non-payment is specifically dealt with by Article 46, Article 45 reinforces the broader scheme that serious adverse membership consequences are governed by the Articles and should not be inferred beyond their terms. The principal case of the Appellant, however, rests upon section 10(7), Rule 15 and Articles 46–47.

9. MCCI's continued use of the same membership number confirms that the Company was re-enrolled as an existing/old member, not admitted as a new member for the first time.

It is significant that upon re-enrolment MCCI issued the Company its membership certificate under the same membership/registration number that had been allotted to Fazal Farms (Pvt) Ltd and used for its membership for many years prior to the temporary lapse in payment of annual subscription. MCCI did not allot the Company a new membership number upon its re-enrolment. Instead, it continued the Company's longstanding membership identity in its own records.

Accordingly, MCCI cannot reasonably treat the Company as a wholly new member for electoral purposes while simultaneously maintaining and recognizing the same membership number under which the Company had remained a member for many years. In any event, even if the re-enrolment dated 01.07.2025 is treated as commencing a fresh qualifying period, the Company had completed the requisite one year before announcement of the 2026 election schedule and was therefore eligible to vote under section 10(7).

The continued use of the same membership number is therefore consistent with the Company's status as an "old member" whose membership had been discontinued due to non-payment and subsequently re-enrolled, within the meaning of section 10(7) of the Trade Organizations Act, 2013. It further distinguishes the Company from a genuinely new member being enrolled with MCCI for the first time.

10. The impugned decision should be set aside because, on either legal route, exclusion from the 2026 voters' list is unsustainable.

If MCCI establishes lawful discontinuance of the earlier membership, the Company nevertheless completed the one-year period following re-enrolment on 01.07.2026 and is eligible under the special rule applicable to old members. Alternatively, if MCCI cannot establish compliance with Article 46(iii) for cessation/removal, its premise of automatic discontinuance is itself open to challenge. On either approach, the Company's exclusion from the final voters' list requires reconsideration and the Appellant is entitled to the relief prayed for.

PRAYER

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may kindly set aside the decision dated 07.08.2026 of the Election Commission and the underlying rejection of the Secretary General, MCCI, and direct that the name of Fazal Farms (Pvt) Ltd be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028, thereby enabling the Company to exercise its lawful right to vote through its Authorized Representative. Without prejudice, if the Directorate considers further factual verification necessary, the Appellant respectfully requests that MCCI be directed to produce the Executive Committee resolution fixing the relevant payment date, notice(s) issued under Article 46(iii), proof of service, any cessation/removal resolution and the relevant Register of Members entries. The Appellant further requests an opportunity of personal hearing and permission to place its complete membership record, payment record, membership certificates and MCCI correspondence before the Directorate.

Best Regards

P.O. No. 30591564 attached as Appeal fee

For & on behalf of Fazal Farms (Pvt) Ltd

Basharat Hashmi

Company Secretary

Encl.: As above.

August 10, 2026

The Directorate General of Trade Organizations (DGTO)
2nd Floor, State Life Building No. 7,
Blue Area (China Chowk)
Sector F-6/4
ISLAMABAD.

Subject: APPEAL AGAINST OBJECTION OF MULTAN CHAMBER OF COMMERCE & INDUSTRY – EXCLUSION OF M/S. HUSSAIN MILLS LIMITED FROM FINAL VOTERS' LIST FOR TERM 2026–2028

Respected Sir,

M/s. Hussain Mills Limited (the "Appellant") respectfully submits this appeal against the objection dated 31.07.2026 ref no.MCCI/2026/0792/07-6201 raised by Multan Chamber of Commerce & Industry ("MCCI"), whereby MCCI declined inclusion of the Appellant in the final voters' list for the MCCI elections for the term 2026–2028. The impugned decision proceeds principally on the view that the Appellant's earlier membership automatically ceased upon non-payment of annual subscription, that its subsequent enrolment constituted a wholly new and independent membership, and that the earlier period of membership cannot be counted for purposes of Rule 15(1)(a) of the Trade Organizations Rules, 2013. The Appellant respectfully submits that these findings are based on an erroneous construction of the governing Rules and Articles and are liable to be set aside.

GROUNDS OF APPEAL

1. Rule 15(1)(a) does not prescribe "continuous" or "uninterrupted" membership.

The Election Commission has effectively inserted into Rule 15(1)(a) words which the rule-making authority did not use. The statutory expression is "completed two years of valid membership". It does not state "two consecutive years", "two continuous years", "two uninterrupted years", or "two years immediately preceding the election". Where the legislature has prescribed a qualifying period in clear terms, an administrative body cannot enlarge that condition by adding a further requirement. The Appellant had admittedly been a member of MCCI previously and had completed membership periods exceeding the statutory qualifying period. Those periods cannot be disregarded merely by importing an additional requirement of continuity into Rule 15(1)(a).

2. The Election Commission has conflated cessation/non-renewal for a particular membership year with erasure of historical valid membership.

Even if, for the sake of argument, Rule 11(4) read with Article 28(3) resulted in cessation of membership upon failure to pay annual subscription by the prescribed date, that does not answer the separate statutory question under Rule 15(1)(a): whether the member has "completed two years of valid membership". A period during which membership was admittedly valid does not retrospectively become invalid merely because membership later lapsed or ceased. The impugned

3. Rule 11(4) governs the annual duration/expiry of membership; it does not expressly prescribe the electoral consequence adopted in the impugned decision.

The Election Commission relies upon Rule 11(4) for the proposition that membership is granted for one year and expires on 31 March. However, the eligibility to vote is specifically governed by Rule 15. The consequence of annual expiry under Rule 11(4) cannot be extended so as to rewrite the qualifying language of Rule 15(1)(a). Had the rule-making authority intended that only membership completed after the latest enrolment, or only uninterrupted membership, could count, it could expressly have said so.

4. The finding that "valid membership" necessarily means "subsisting, uninterrupted" membership is unsupported by the text of Rule 15(1)(a).

The impugned decision states that "valid membership" necessarily denotes membership that is "subsisting, uninterrupted and recognized under the governing law". With respect, the addition of "uninterrupted" is an interpretation rather than language appearing in Rule 15(1)(a). "Valid" ordinarily addresses the legal validity of the membership during the period for which it existed. The Appellant's earlier membership was recognized by MCCI and was never alleged to have been void, fraudulent or otherwise invalid during those years. A subsequent lapse cannot retrospectively invalidate those completed periods.

5. Continued recognition of the same membership identity is material and has not been adequately addressed.

MCCI's own record and membership documentation should be examined to determine whether the Appellant continued under the same membership/registration identity after payment and re-enrolment. The mere obtaining of a fresh form, particularly where it was submitted at the direction of the MCCI office, cannot by itself determine the legal character of the membership. Substance must prevail over the nomenclature or administrative form used by the Chamber. If the same membership identity/registration number continued to be recognized, this materially supports the Appellant's case that the transaction was restoration/renewal of an existing membership relationship rather than creation of an entirely unrelated membership.

6. The fresh membership form cannot create a statutory disqualification that does not otherwise exist.

The Election Commission has treated submission of a fresh membership application and payment of admission/membership fee as conclusive proof that all earlier membership became irrelevant for electoral eligibility. The Appellant respectfully submits that an administrative form required by MCCI cannot amend Rule 15(1)(a). Even if the Chamber processed the application as a fresh enrolment for administrative purposes, the legal question remains whether Rule 15 prohibits counting periods of earlier valid membership. No such prohibition has been identified in the impugned decision.

7. Article 28(3) and the provisions concerning removal from membership must be read harmoniously.

The impugned decision treats Article 28(3) as producing automatic and final cessation without addressing the procedural protections relied upon by the Appellant concerning removal from the Register of Members. The Articles must be read as a whole. To the extent the Articles contemplate notice/opportunity before removal from the Register, the Election Commission was required to reconcile those provisions and determine their effect instead of treating Article 28(3) in isolation as conclusively extinguishing the entire pre-existing membership history.

8. The impugned interpretation produces a consequence not expressly contemplated by the Rules.

Under the Election Commission's interpretation, a member with many years of valid membership who misses one annual renewal deadline is placed, for voting purposes, in the same position as a person who has never previously been a member and must start the qualifying period afresh. Such a substantial electoral disability should arise from clear statutory language. Rule 15(1)(a), as reproduced and relied upon in the proceedings, contains no express provision that previous valid membership is forfeited, erased, or incapable of being aggregated after a lapse.

9. The proviso to Rule 15(1)(a) should also be independently examined.

Without prejudice to the foregoing, the Appellant reiterates its reliance upon the proviso to Rule 15(1)(a), as already cited in its representation, concerning eligibility of old members upon completion of the prescribed period from enrolment and payment of outstanding dues. The Appellant has discharged the relevant dues. The proviso should be given independent effect rather than being rendered ineffective by treating every delayed renewal as a wholly new membership for electoral purposes.

10. The Election Commission's conclusion is therefore based on a condition added to the statutory text.

The decisive reasoning in the impugned order is that earlier membership cannot be "tacked on" because valid membership must be uninterrupted. Since Rule 15(1)(a) itself does not contain that restriction, the rejection rests upon an implied disqualification. Eligibility should be determined strictly according to the conditions actually prescribed by law, not by additional conditions created through administrative interpretation.

PRAYER

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may be pleased to set aside the order dated 31.07.2026 of the Secretary General, MCCI, and direct that the name of M/s. Hussain Mills Limited be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028. Any other relief deemed just and appropriate in the circumstances may also kindly be granted.

The Appellant further requests an opportunity of personal hearing and permission to place the complete membership record, renewal/payment record, membership certificates and relevant MCCI correspondence before the Directorate.

PO No. 30591564 attached
as appeal Fee

Best Regards

For & on behalf of
M/s. Hussain Mills Limited,

HUSSAIN MILLS LIMITED MULTAN

Muhammad Asif
Authorized Representative

Encl.: As above.

FAZAL HOLDINGS (PVT.) LIMITED

(Formerly: Amir Fine Exports (Pvt.) Limited)

BEFORE THE DIRECTOR GENERAL TRADE ORGANIZATIONS
MINISTRY OF COMMERCE, GOVERNMENT OF PAKISTAN, ISLAMABAD

APPEAL REGARDING EXCLUSION FROM THE VOTERS' LIST OF MULTAN CHAMBER OF COMMERCE & INDUSTRY

Appellant:
M/s Fazal Holding (Private) Limited
Membership No. C-347
Multan Chamber of Commerce & Industry

Versus
Multan Chamber of Commerce & Industry (MCCI)

MOST RESPECTFULLY SUBMITTED:

1. Longstanding membership of the Appellant

That the Appellant, M/s Fazal Holding (Private) Limited, is an old and longstanding Corporate Class member of the Multan Chamber of Commerce & Industry ("MCCI") bearing Membership No. C-347.

The documentary record establishes that Membership No. C-347 existed well before the present election year. In particular, the MCCI membership certificate for the year 2024-2025 expressly records Fazal Holdings (Pvt.) Ltd. as a Corporate Class member under Membership No. C-347, valid up to 31 March 2025.

Accordingly, this is not a case of an entity seeking membership of MCCI for the first time.

2. Payment of fee and submission of membership form

The Appellant's membership was due for renewal on 31 March 2025. The requisite membership fee was subsequently paid and the membership form was submitted to MCCI on 18 September 2025.

MCCI thereafter issued the membership certificate on 6 October 2025, valid up to 31 March 2026.

Significantly, MCCI did not allot any new membership number to the Appellant. The certificate continued to identify the Appellant under the same longstanding Membership No. C-347. The certificate for the following year 2026-2027 once again records precisely the same Membership No. C-347.

3. Certificate dated 06.10.2025 does not establish commencement of a new membership

The mere issuance of a certificate on 6 October 2025 cannot legally be treated as establishing that the Appellant became a member of MCCI for the first time on that date.

The Appellant was admittedly an existing member holding Membership No. C-347 prior to 31 March 2025. The subsequent payment of dues and issuance of another certificate under the same membership number constitutes renewal/restoration/re-enrolment of an existing member and not admission of an entirely new member.

The administrative date appearing upon a subsequently issued certificate cannot erase the Appellant's historical membership or convert an old member into a first-time member.

HEAD OFFICE: 59/3, Abdali Road, Multan. Tel: +92 61 4579001-7, 4781637 Fax: +92 61 4541832
E-mail: sohail@fazalcloth.com

4. Article 47 expressly contemplates restoration of membership

Article 47 of the Articles of Association of MCCI specifically provides for restoration of membership where membership has been removed for non-payment, subject to compliance with the prescribed requirements, including payment of the applicable amounts.

The very concept of "restoration" necessarily recognizes that the person concerned is an old member whose membership is being restored, rather than an entirely new member acquiring membership for the first time.

Therefore, the Appellant's payment of the requisite fee and submission of its membership form on 18 September 2025, followed by issuance of a certificate bearing its pre-existing Membership No. C-347, must be considered in the context of restoration/continuation of its historical membership.

5. Article 46 requirements must first be established

Without prejudice, before treating the Appellant's longstanding membership as having legally ceased on 31 March 2025, the Chamber must establish compliance with the applicable requirements of Article 46, including Article 45 (C)(iii).

The relevant record should establish, inter alia, the applicable payment deadline, the requisite notice to the Appellant, service of such notice, the date and authority under which membership was actually ceased/removed, and the corresponding entry in the membership register.

A mere delay in payment cannot retrospectively be treated as proof that the Appellant became an entirely new member on 6 October 2025 without first determining the legal consequences under Articles 46 and 47.

6. Section 10(7) of TO Act does not justify treating an old restored member as a first-time member

Section 10(7) of the Trade Organizations Act must be read together with the statutory scheme governing membership and the Articles of Association.

The requirement relating to the period of membership cannot be applied by simply ignoring the Appellant's admittedly longstanding membership and taking the date printed on a restored membership certificate as the date on which membership first commenced.

Such an interpretation would introduce into the statute a requirement of continuous or uninterrupted membership which the legislature has not expressly imposed.

7. Islamabad High Court judgment in Aftab Ahmed Barlas v. DGTO

The Islamabad High Court in Aftab Ahmed Barlas v. Director General Trade Organizations, 2021 CLD 204 (Islamabad), is particularly relevant to the distinction between a genuinely new member and an old member whose membership had earlier been discontinued on account of non-payment.

The judgment recognizes that an old member re-enrolled after discontinuation for non-payment cannot simply be equated with a person obtaining membership for the first time.

The principle emerging from Barlas therefore supports the Appellant's case that its historical membership must be given legal effect rather than treating 6 October 2025 as though Fazal Holding first became a member of MCCI on that date.

8. Same Membership No. C-347 is compelling evidence of restoration/continuity

The documentary record is particularly significant because MCCI itself has continuously identified the Appellant through Membership No. C-347.

The certificate valid up to 31 March 2025 carried Membership No. C-347. After payment/submission on 18 September 2025, the certificate issued on 6 October 2025 again carried C-347. The certificate for 2026-2027 once again carries C-347.

Had the Appellant been admitted as a genuinely new member, rather than restored/re-enrolled as an existing member, the continued use of its historical membership number would be difficult to explain.

The continued use of C-347 therefore provides strong contemporaneous documentary evidence that MCCI itself treated the Appellant as the same member and did not create a new membership identity on 6 October 2025.

9. Form cannot override the substantive nature of membership

The fact that MCCI may have required the Appellant to submit a membership/re-enrolment form on 18 September 2025 is an administrative matter.

The nomenclature or form used by MCCI cannot determine the statutory character of the membership. The substantive facts remain that:

(a) Fazal Holding was already an MCCI Corporate Class member;
(b) its membership number was C-347;
(c) the membership certificate remained valid up to 31 March 2025;
(d) fee was paid and the required form submitted on 18 September 2025;
(e) MCCI issued the subsequent certificate on 6 October 2025 under the same Membership No. C-347; and
(f) MCCI again renewed the same C-347 membership for 2026-2027.

Accordingly, the transaction must be considered as restoration/re-enrolment/renewal of an existing membership and not admission of a new member.

10. Eligibility must be determined according to the law, not merely the date printed on the certificate

The Appellant's voting eligibility cannot lawfully be rejected merely by calculating one year backwards from 6 October 2025.

Such an approach assumes the very proposition that requires determination - namely, that the Appellant's membership legally commenced afresh on 6 October 2025.

Before imposing any voting disability, the DGTO must determine:

(a) whether and when the old membership legally ceased under Article 46;
(b) whether the subsequent transaction constituted restoration under Article 47;
(c) the effect of the Appellant retaining the identical Membership No. C-347;
(d) the Appellant's historical membership prior to 31 March 2025; and
(e) the principles laid down by the Islamabad High Court in Aftab Ahmed Barlas.

Unless these matters are determined, exclusion merely by reference to the certificate issuance date would be arbitrary and contrary to the statutory scheme.

PRAYER

a. Set aside the decision/order whereby M/s Fazal Holding (Private) Limited has been excluded from the voters' list of MCCI;

b. Declare that the certificate dated 6 October 2025 did not constitute admission of Fazal Holding as a first-time member, but represented renewal/restoration/re-enrolment of its pre-existing Corporate Class membership bearing Membership No. C-347;

c. Hold that the Appellant's longstanding membership and the provisions of Articles 46 and 47 must be taken into account while determining its voting eligibility;

d. Direct MCCI to include M/s Fazal Holding (Private) Limited, Membership No. C-347, in the relevant voters' list for the MCCI elections; and

e. Grant any other relief deemed just and appropriate in the circumstances.

PO No. 30591564 attach as Appeal fee

Appellant
M/s Fazal Holding (Private) Limited
Membership No. C-347

HUSSAIN GINNERIES LTD.
Cotton Ginning & Pressing Factory. Ph: 0662422399
Mauza Khulang Janubi Shah Jamal Jatoi Road, Distt. Muzaffar Garh

August 10, 2026

The Directorate General of Trade Organizations (DGTO)
2nd Floor, State Life Building No. 7, Blue Area (China Chowk)
Sector F-6/4
ISLAMABAD

Subject: DECISION OF THE ELECTION COMMISSION OF THE MULTAN CHAMBER OF COMMERCE & INDUSTRY IN THE APPEAL FILED BY THE APPELLANT

Respected Sir,

This is with reference to the letter dated August 3, 2026 concerning exclusion of the name of Hussain Ginneries Ltd (the "Company" / "Appellant") from the voters' list and the subsequent appeal before the Election Commission, which upheld the rejection vide decision dated 07.08.2026 (Exhibit-B/1 & B/2). The Appellant respectfully submits that the impugned decision is contrary to section 10(7) of the Trade Organizations Act, 2013, Rule 15 of the Trade Organizations Rules, 2013 and the relevant provisions of the Articles of Association of MCCI, for the reasons set out below.

GROUNDS OF APPEAL

In this regard, we respectfully submit as under:

MATERIAL CHRONOLOGY

For clarity, the material dates are not in dispute:

31.03.2025: The Company had not paid its annual membership dues for the year 2025 by 31 March 2025.

19.06.2025: The outstanding membership dues were paid to MCCI.

24.06.2025: At the direction/requirement of MCCI, an application for membership was submitted.

01.07.2025: MCCI issued a fresh membership certificate to the Company.

July 2026: MCCI announced the election schedule for the 2026–2028 elections, i.e. after completion of one full year from 01.07.2025.

LEGAL GROUNDS

1. The Appellant independently satisfies section 10(7) of the Trade Organizations Act, 2013.

Section 10(7) provides that new members become eligible to vote on completion of two years of enrolment and payment of all dues, while its proviso specifically addresses old members whose membership has been discontinued due to non-payment of subscription dues and makes them eligible to vote on completion of one year of re-enrolment and payment of all dues. The Company is admittedly an old member of MCCI. Even if the position most favourable to MCCI is accepted — namely that the earlier membership stood discontinued and that the certificate dated 01.07.2025 represented re-enrolment — the Company had completed one full year of such re-enrolment by 01.07.2026, before announcement of the 2026–2028 election schedule. The statutory waiting period applicable to an old re-enrolled member was therefore already complete.

2. Rule 15 must be read subject to section 10 of the Act, and the Appellant satisfies that combined statutory test.

Rule 15(1) expressly makes voting eligibility subject to section 10 of the Act. Rule 15(1)(a) requires the prescribed period of valid membership as on the date of announcement of the election schedule and contains a proviso for old members; Rule 15(1)(b) separately requires compliance with the membership and renewal conditions under Rule 11. The Company had paid its dues, had been issued a membership certificate on 01.07.2025 and, by the time the 2026 election schedule was announced, had completed more than one year after re-enrolment. Accordingly, even on MCCI's own characterization of the transaction as fresh/re-enrolment, the Company satisfies the statutory eligibility test applicable to an old member.

3. The Islamabad High Court has expressly recognized the voting right of an old member after completion of one year following re-enrolment - a condition admittedly satisfied by the Company.

In Aftab Ahmed Barlas v. Director General of Trade Organization (2021 CLD 204), the Islamabad High Court considered the voting eligibility of an old member whose membership had been discontinued for non-payment of subscription and subsequently restored/re-enrolled. While construing section 10(7) of the Trade Organizations Act, 2013 together with the applicable Rules, the Hon'ble Court held that such an old member becomes eligible to vote upon completion of one year after re-enrolment, subject to payment of the requisite dues.

Accordingly, once it is admitted that Hussain Ginneries Ltd was an old member, had paid its outstanding dues, was re-enrolled no later than 01.07.2025, and had completed one year of such re-enrolment before the relevant election schedule, its eligibility to vote follows directly from the principle laid down by the Islamabad High Court. The very precedent which requires an old re-enrolled member to wait for one year consequently establishes the Company's right to vote once that one-year period has been completed.

The judgment therefore supports the present appeal. Even if MCCI's position is accepted in its entirety - namely, that the Company's earlier membership stood discontinued due to non-payment and that the membership certificate issued on 01.07.2025 constituted a fresh re-enrolment - the Company had admittedly completed one full year of such re-enrolment on 01.07.2026, before the announcement of the MCCI election schedule for the term 2026-2028. The statutory condition identified and enforced by the Islamabad High Court therefore stood fully satisfied in the Company's case.

4. The Election Commission's approach fails to give effect to the special statutory treatment of an "old member".

The proviso to section 10(7) exists precisely to deal with an old member whose membership was discontinued for non-payment and later renewed/re-enrolled. Such a member is not treated in the same manner as a person becoming a member for the first time. If the impugned decision requires the Company to complete a fresh two-year period from 01.07.2025 notwithstanding its status as an old member, it effectively renders the statutory proviso nugatory. The specific one-year rule for old re-enrolled members must be given effect.

5. Article 47 of MCCI's Articles is consistent with restoration/re-enrolment of an old member and supports the application of the one-year rule.

Article 47, under the heading "RESTORATION OF MEMBERSHIP", provides for re-enrolment of a member whose name has been removed from the Register due to non-payment, upon payment of the prescribed admission fee afresh together with outstanding arrears. The Company's subsequent application and the membership certificate issued on 01.07.2025 therefore fit the Articles' own concept of restoration/re-enrolment following non-payment. That characterization reinforces, rather than defeats, the Company's reliance on the special statutory rule for old members under section 10(7).

6. Without prejudice, MCCI must also establish that cessation/removal under Article 46(iii) was lawfully effected.

Article 46 specifically governs cessation of membership. In the case of non-payment, Article 46 C(iii) refers to failure to pay annual subscription or other dues by a date determined by the Executive Committee, despite notice for payment, and also recognizes the Executive Committee's power to extend time. Accordingly, if MCCI relies upon formal cessation/removal of the earlier membership, it should be required to produce the relevant Executive Committee decision fixing the payment date, the notice for payment, proof of service, any resolution/order recording cessation or removal, and the corresponding entry in the Register of Members. In the absence of such material, automatic and final cessation should not merely be presumed.

7. Article 46 and Article 47 must be read together, not in isolation.

The Articles contemplate both cessation for specified causes and restoration/re-enrolment after removal for non-payment. Read together, they establish a structured mechanism dealing with an existing member who falls into arrears. They do not support treating such a person as an entirely unrelated first-time entrant for all purposes. At the very least, once restoration/re-enrolment took effect on 01.07.2025, the Company entered the statutory category of an old member re-enrolled after discontinuance, to whom the one-year voting rule applies.

8. Article 45 remains relevant as a supporting due-process provision, but the Appellant does not rest its case upon Article 45 alone.

Article 45(c)(iii) provides procedural protection in cases of expulsion/withdrawal of membership rights for intentional violation of the Chamber's rules, regulations or by-laws. While non-payment is specifically dealt with by Article 46, Article 45 reinforces the broader scheme that serious adverse membership consequences are governed by the Articles and should not be inferred beyond their terms. The principal case of the Appellant, however, rests upon section 10(7), Rule 15 and Articles 46–47.

9. MCCI's continued use of the same membership number confirms that the Company was re-enrolled as an existing/old member, not admitted as a new member for the first time.

It is significant that upon re-enrolment MCCI issued the Company its membership certificate under the same membership/registration number that had been allotted to Hussain Ginneries Ltd and used for its membership for many years prior to the temporary lapse in payment of annual subscription. MCCI did not allot the Company a new membership number upon its re-enrolment. Instead, it continued the Company's longstanding membership identity in its own records.

Accordingly, MCCI cannot reasonably treat the Company as a wholly new member for electoral purposes while simultaneously maintaining and recognizing the same membership number under which the Company had remained a member for many years. In any event, even if the re-enrolment dated 01.07.2025 is treated as commencing a fresh qualifying period, the Company had completed the requisite one year before announcement of the 2026 election schedule and was therefore eligible to vote under section 10(7).

The continued use of the same membership number is therefore consistent with the Company's status as an "old member" whose membership had been discontinued due to non-payment and subsequently re-enrolled, within the meaning of section 10(7) of the Trade Organizations Act, 2013. It further distinguishes the Company from a genuinely new member being enrolled with MCCI for the first time.

10. The impugned decision should be set aside because, on either legal route, exclusion from the 2026 voters' list is unsustainable.

If MCCI establishes lawful discontinuance of the earlier membership, the Company nevertheless completed the one-year period following re-enrolment on 01.07.2026 and is eligible under the special rule applicable to old members. Alternatively, if MCCI cannot establish compliance with Article 46(iii) for cessation/removal, its premise of automatic discontinuance is itself open to challenge. On either approach, the Company's exclusion from the final voters' list requires reconsideration and the Appellant is entitled to the relief prayed for.

PRAYER

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may kindly set aside the decision dated 07.08.2026 of the Election Commission and the underlying rejection of the Secretary General, MCCI, and direct that the name of Hussain Ginneries Ltd be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028, thereby enabling the Company to exercise its lawful right to vote through its Authorized Representative. Without prejudice, if the Directorate considers further factual verification necessary, the Appellant respectfully requests that MCCI be directed to produce the Executive Committee resolution fixing the relevant payment date, notice(s) issued under Article 46(iii), proof of service, any cessation/removal resolution and the relevant Register of Members entries. The Appellant further requests an opportunity of personal hearing and permission to place its complete membership record, payment record, membership certificates and MCCI correspondence before the Directorate.

Best Regards

PO 30591564 attached as appeal fee

For & on behalf of Hussain Ginneries Ltd

Basharat

Basharat Hashmi

Company Secretary

Encl.: As above.

August 10, 2026

The Directorate General of Trade Organizations (DGTO)

2nd Floor, State Life Building No. 7, Blue Area (China Chowk)

Sector F-6/4

ISLAMABAD

Subject: DECISION OF THE ELECTION COMMISSION OF THE MULTAN CHAMBER OF COMMERCE & INDUSTRY IN THE APPEAL FILED BY THE APPELLANT

Respected Sir,

This is with reference to the letter dated August 3, 2026 concerning exclusion of the name of Zaffar Nasir Oil Extraction Ltd (the "Company" / "Appellant") from the voters' list and the subsequent appeal before the Election Commission, which upheld the rejection vide decision dated 07.08.2026 (Exhibit-B/1 & B/2). The Appellant respectfully submits that the impugned decision is contrary to section 10(7) of the Trade Organizations Act, 2013, Rule 15 of the Trade Organizations Rules, 2013 and the relevant provisions of the Articles of Association of MCCI, for the reasons set out below.

GROUNDS OF APPEAL

In this regard, we respectfully submit as under:

MATERIAL CHRONOLOGY

For clarity, the material dates are not in dispute:

31.03.2025: The Company had not paid its annual membership dues for the year 2025 by 31 March 2025.

19.06.2025: The outstanding membership dues were paid to MCCI.

24.06.2025: At the direction/requirement of MCCI, an application for membership was submitted.

01.07.2025: MCCI issued a fresh membership certificate to the Company.

July 2026: MCCI announced the election schedule for the 2026–2028 elections, i.e. after completion of one full year from 01.07.2025.

LEGAL GROUNDS

1. The Appellant independently satisfies section 10(7) of the Trade Organizations Act, 2013.

Section 10(7) provides that new members become eligible to vote on completion of two years of enrolment and payment of all dues, while its proviso specifically addresses old members whose membership has been discontinued due to non-payment of subscription dues and makes them eligible to vote on completion of one year of re-enrolment and payment of all dues. The Company is admittedly an old member of MCCI. Even if the position most favourable to MCCI is accepted — namely that the earlier membership stood discontinued and that the certificate dated 01.07.2025 represented re-enrolment — the Company had completed one full year of such re-enrolment by 01.07.2026, before announcement of the 2026–2028 election schedule. The statutory waiting period applicable to an old re-enrolled member was therefore already complete.

2. Rule 15 must be read subject to section 10 of the Act, and the Appellant satisfies that combined statutory test.

Rule 15(1) expressly makes voting eligibility subject to section 10 of the Act. Rule 15(1)(a) requires the prescribed period of valid membership as on the date of announcement of the election schedule and contains a proviso for old members; Rule 15(1)(b) separately requires compliance with the membership and renewal conditions under Rule 11. The Company had paid its dues, had been issued a membership certificate on 01.07.2025 and, by the time the 2026 election schedule was announced, had completed more than one year after re-enrolment. Accordingly, even on MCCI's own characterization of the transaction as fresh/re-enrolment, the Company satisfies the statutory eligibility test applicable to an old member.

3. The Islamabad High Court has expressly recognized the voting right of an old member after completion of one year following re-enrolment - a condition admittedly satisfied by the Company.

In Aftab Ahmed Barlas v. Director General of Trade Organization (2021 CLD 204), the Islamabad High Court considered the voting eligibility of an old member whose membership had been discontinued for non-payment of subscription and subsequently restored/re-enrolled. While construing section 10(7) of the Trade Organizations Act, 2013 together with the applicable Rules, the Hon'ble Court held that such an old member becomes eligible to vote upon completion of one year after re-enrolment, subject to payment of the requisite dues.

Accordingly, once it is admitted that Zaffar Nasir Oil Extraction Ltd was an old member, had paid its outstanding dues, was re-enrolled no later than 01.07.2025, and had completed one year of such re-enrolment before the relevant election schedule, its eligibility to vote follows directly from the principle laid down by the Islamabad High Court. The very precedent which requires an old re-enrolled member to wait for one year consequently establishes the Company's right to vote once that one-year period has been completed.

The judgment therefore supports the present appeal. Even if MCCI's position is accepted in its entirety - namely, that the Company's earlier membership stood discontinued due to non-payment and that the membership certificate issued on 01.07.2025 constituted a fresh re-enrolment - the Company had admittedly completed one full year of such re-enrolment on 01.07.2026, before the announcement of the MCCI election schedule for the term 2026-2028. The statutory condition identified and enforced by the Islamabad High Court therefore stood fully satisfied in the Company's case.

4. The Election Commission's approach fails to give effect to the special statutory treatment of an "old member".

The proviso to section 10(7) exists precisely to deal with an old member whose membership was discontinued for non-payment and later renewed/re-enrolled. Such a member is not treated in the same manner as a person becoming a member for the first time. If the impugned decision requires the Company to complete a fresh two-year period from 01.07.2025 notwithstanding its status as an old member, it effectively renders the statutory proviso nugatory. The specific one-year rule for old re-enrolled members must be given effect.

5. Article 47 of MCCI's Articles is consistent with restoration/re-enrolment of an old member and supports the application of the one-year rule.

Article 47, under the heading "RESTORATION OF MEMBERSHIP", provides for re-enrolment of a member whose name has been removed from the Register due to non-payment, upon payment of the prescribed admission fee afresh together with outstanding arrears. The Company's subsequent application and the membership certificate issued on 01.07.2025 therefore fit the Articles' own concept of restoration/re-enrolment following non-payment. That characterization reinforces, rather than defeats, the Company's reliance on the special statutory rule for old members under section 10(7).

6. Without prejudice, MCCI must also establish that cessation/removal under Article 46(iii) was lawfully effected.

Article 46 specifically governs cessation of membership. In the case of non-payment, Article 46 C(iii) refers to failure to pay annual subscription or other dues by a date determined by the Executive Committee, despite notice for payment, and also recognizes the Executive Committee's power to extend time. Accordingly, if MCCI relies upon formal cessation/removal of the earlier membership, it should be required to produce the relevant Executive Committee decision fixing the payment date, the notice for payment, proof of service, any resolution/order recording cessation or removal, and the corresponding entry in the Register of Members. In the absence of such material, automatic and final cessation should not merely be presumed.

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The Articles contemplate both cessation for specified causes and restoration/re-enrolment after removal for non-payment. Read together, they establish a structured mechanism dealing with an existing member who falls into arrears. They do not support treating such a person as an entirely unrelated first-time entrant for all purposes. At the very least, once restoration/re-enrolment took effect on 01.07.2025, the Company entered the statutory category of an old member re-enrolled after discontinuance, to whom the one-year voting rule applies.

8. Article 45 remains relevant as a supporting due-process provision, but the Appellant does not rest its case upon Article 45 alone.

Article 45(c)(iii) provides procedural protection in cases of expulsion/withdrawal of membership rights for intentional violation of the Chamber's rules, regulations or by-laws. While non-payment is specifically dealt with by Article 46, Article 45 reinforces the broader scheme that serious adverse membership consequences are governed by the Articles and should not be inferred beyond their terms. The principal case of the Appellant, however, rests upon section 10(7), Rule 15 and Articles 46–47.

9. MCCI's continued use of the same membership number confirms that the Company was re-enrolled as an existing/old member, not admitted as a new member for the first time.

It is significant that upon re-enrolment MCCI issued the Company its membership certificate under the same membership/registration number that had been allotted to Zaffar Nasir Oil Extraction Ltd and used for its membership for many years prior to the temporary lapse in payment of annual subscription. MCCI did not allot the Company a new membership number upon its re-enrolment. Instead, it continued the Company's longstanding membership identity in its own records.

Accordingly, MCCI cannot reasonably treat the Company as a wholly new member for electoral purposes while simultaneously maintaining and recognizing the same membership number under which the Company had remained a member for many years. In any event, even if the re-enrolment dated 01.07.2025 is treated as commencing a fresh qualifying period, the Company had completed the requisite one year before announcement of the 2026 election schedule and was therefore eligible to vote under section 10(7).

The continued use of the same membership number is therefore consistent with the Company's status as an "old member" whose membership had been discontinued due to non-payment and subsequently re-enrolled, within the meaning of section 10(7) of the Trade Organizations Act, 2013.

It further distinguishes the Company from a genuinely new member being enrolled with MCCI for the first time.

10. The impugned decision should be set aside because, on either legal route, exclusion from the 2026 voters' list is unsustainable.

If MCCI establishes lawful discontinuance of the earlier membership, the Company nevertheless completed the one-year period following re-enrolment on 01.07.2026 and is eligible under the special rule applicable to old members. Alternatively, if MCCI cannot establish compliance with Article 46(iii) for cessation/removal, its premise of automatic discontinuance is itself open to challenge. On either approach, the Company's exclusion from the final voters' list requires reconsideration and the Appellant is entitled to the relief prayed for.

PRAYER

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may kindly set aside the decision dated 07.08.2026 of the Election Commission and the underlying rejection of the Secretary General, MCCI, and direct that the name of Zaffar Nasir Oil Extraction Ltd be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028, thereby enabling the Company to exercise its lawful right to vote through its Authorized Representative. Without prejudice, if the Directorate considers further factual verification necessary, the Appellant respectfully requests that MCCI be directed to produce the Executive Committee resolution fixing the relevant payment date, notice(s) issued under Article 46(iii), proof of service, any cessation/removal resolution and the relevant Register of Members entries. The Appellant further requests an opportunity of personal hearing and permission to place its complete membership record, payment record, membership certificates and MCCI correspondence before the Directorate.

Best Regards

PO No 30591564 attached as appeal fee

For & on behalf of Zaffar Nasir Oil Extraction Ltd

Basharat Hashmi

Company Secretary

Encl.: As above.

Fatima Energy
L i m i t e d
A Fatima Group Company

August 10, 2026

The Directorate General of Trade Organizations (DGTO)
2nd Floor, State Life Building No. 7, Blue Area (China Chowk)
Sector F-6/4
ISLAMABAD

Sub: **DECISION OF THE ELECTION COMMISSION OF THE MULTAN CHAMBER OF COMMERCE & INDUSTRY IN THE APPEAL FILED BY THE APPELLANT**

Respected Sir,

This is with reference to the letter dated August 3, 2026 concerning exclusion of the name of Fatima Energy Limited (the "Company" / "Appellant") from the voters' list and the subsequent appeal before the Election Commission, which upheld the rejection vide decision dated 07.08.2026 (Exhibit-B/1 & B/2). The Appellant respectfully submits that the impugned decision is contrary to Section 10(7) of the Trade Organizations Act, 2013, Rule 15 of the Trade Organizations Rules, 2013 and the relevant provisions of the Articles of Association of MCCI, for the reasons set out below.

GROUNDS OF APPEAL:
In this regard, we respectfully submit as under:

MATERIAL CHRONOLOGY:
For clarity, the material dates are not in dispute:

31.03.2024: The Company had not paid its annual membership dues for the year 2024 by 31 March 2024.
28.02.2025: The outstanding membership dues were paid to MCCI.
28.02.2025: At the direction/requirement of MCCI, an application for membership was submitted.
28.02.2025: MCCI issued a fresh membership certificate to the Company.
July 2026: MCCI announced the election schedule for the 2026–2028 elections, i.e. after completion of one full year from 01.07.2025.

LEGAL GROUNDS:

1. ***The Appellant independently satisfies Section 10(7) of the Trade Organizations Act, 2013:***

Section 10(7) provides that new members become eligible to vote on completion of two years of enrolment and payment of all dues, while its proviso specifically addresses old members whose membership has been discontinued due to non-payment of subscription dues and makes them eligible to vote on completion of one year of re-enrolment and payment of all dues. The Company is admittedly an old member of MCCI. Even if the position most favorable to MCCI is accepted — namely that the earlier membership stood discontinued and that the certificate dated 28.02.2025 represented
re-enrolment — the Company had completed one full year of such re-enrolment by 01.07.2026, before announcement of the 2026–2028 election schedule. The statutory waiting period applicable to an old re-enrolled member was therefore already complete.

2. ***Rule 15 must be read subject to Section 10 of the Act, and the Appellant satisfies that combined statutory test:***

Rule 15(1) expressly makes voting eligibility subject to Section 10 of the Act. Rule 15(1)(a) requires the prescribed period of valid membership as on the date of announcement of the election schedule and contains a proviso for old members; Rule 15(1)(b) separately requires compliance with the membership and renewal conditions under Rule 11. The Company had paid its dues, had been issued a membership certificate on 28.02.2025 and, by the time the 2026 election schedule was announced, had completed more than one year after re-enrolment. Accordingly, even on MCCI's own characterization of the transaction as fresh/re-enrolment, the Company satisfies the statutory eligibility test applicable to an old member.

3. ***<u>The Islamabad High Court has expressly recognized the voting right of an old member after completion of one year following re-enrolment - a condition admittedly satisfied by the Company:</u>***

In Aftab Ahmed Barlas v. Director General of Trade Organization (2021 CLD 204), the Islamabad High Court considered the voting eligibility of an old member whose membership had been discontinued for non-payment of subscription and subsequently restored/re-enrolled. While construing Section 10(7) of the Trade Organizations Act, 2013 together with the applicable Rules, the Hon'ble Court held that such an old member becomes eligible to vote upon completion of one year after re-enrolment, subject to payment of the requisite dues.

Accordingly, once it is admitted that Fatima Energy Limited was an old member, had paid its outstanding dues, was re-enrolled no later than 28.02.2025, and had completed one year of such re-enrolment before the relevant election schedule, its eligibility to vote follows directly from the principle laid down by the Islamabad High Court. The very precedent which requires an old re-enrolled member to wait for one year consequently establishes the Company's right to vote once that one-year period has been completed.

The judgment, therefore, supports the present appeal. Even if MCCI's position is accepted in its entirety - namely, that the Company's earlier membership stood discontinued due to non-payment and that the membership certificate issued on 28.02.2025 constituted a fresh re-enrolment - the Company had admittedly completed one full year of such re-enrolment on 01.07.2026, before the announcement of the MCCI election schedule for the term 2026-2028. The statutory condition identified and enforced by the Islamabad High Court, therefore, stood fully satisfied in the Company's case.

4. ***<u>The Election Commission's approach fails to give effect to the special statutory treatment of an "Old Member":</u>***

The proviso to Section 10(7) exists precisely to deal with an old member whose membership was discontinued for non-payment and later renewed/re-enrolled. Such a member is not treated in the same manner as a person becoming a member for the first time. If the impugned decision requires the Company to complete a fresh two-year period from 28.02.2025 notwithstanding its status as an old member, it effectively renders the statutory proviso nugatory. The specific one-year rule for old re-enrolled members must be given effect.

5. ***<u>Article 47 of MCCI's Articles is consistent with restoration/re-enrolment of an old member and supports the application of the one-year rule:</u>***

Article 47, under the heading *"RESTORATION OF MEMBERSHIP"*, provides for re-enrolment of a member whose name has been removed from the Register due to non-payment, upon payment of the prescribed admission fee afresh together with outstanding arrears. The Company's subsequent application and the membership certificate issued on 28.02.2025, therefore, fit the Articles' own concept of restoration/re-enrolment following non-payment. That characterization reinforces, rather than defeats, the Company's reliance on the special statutory rule for old members under Section 10(7).

6. ***Without prejudice, MCCI must also establish that cessation/removal under Article 46(iii) was lawfully effected:***

Article 46 specifically governs cessation of membership. In the case of non-payment, Article 46 C(iii) refers to failure to pay annual subscription or other dues by a date determined by the Executive Committee, despite notice for payment, and also recognizes the Executive Committee's power to extend time. Accordingly, if MCCI relies upon formal cessation/removal of the earlier membership, it should be required to produce the relevant Executive Committee decision fixing the payment date, the notice for payment, proof of service, any resolution/order recording cessation or removal, and the corresponding entry in the Register of Members. In the absence of such material, automatic and final cessation should not merely be presumed.

7. ***Article 46 and Article 47 must be read together, not in isolation:***

The Articles contemplate both cessation for specified causes and restoration/re-enrolment after removal for non-payment. Read together, they establish a structured mechanism dealing with an existing member who falls into arrears. They do not support treating such a person as an entirely unrelated first-time entrant for all purposes. At the very least, once restoration/re-enrolment took effect on 28.02.2025, the Company entered the statutory category of an old member re-enrolled after discontinuance, to whom the one-year voting rule applies.

8. ***Article 45 remains relevant as a supporting due-process provision, but the Appellant does not rest its case upon Article 45 alone:***

Article 45(c)(iii) provides procedural protection in cases of expulsion/withdrawal of membership rights for intentional violation of the Chamber's rules, regulations or by-laws. While non-payment is specifically dealt with by Article 46, Article 45 reinforces the broader scheme that serious adverse membership consequences are governed by the Articles and should not be inferred beyond their terms. The principal case of the Appellant, however, rests upon Section 10(7), Rule 15 and Articles 46–47.

9. ***MCCI's continued use of the same membership number confirms that the Company was re-enrolled as an existing/old member, not admitted as a new member for the first time:***

It is significant that upon re-enrolment MCCI issued the Company its membership certificate under the same membership/registration number that had been allotted to Fatima Energy Limited and used for its membership for many years prior to the temporary lapse in payment of annual subscription. MCCI did not allot the Company a new membership number upon its re-enrolment. Instead, it continued the Company's longstanding membership identity in its own records.

Accordingly, MCCI cannot reasonably treat the Company as a wholly new member for electoral purposes while simultaneously maintaining and recognizing the same membership number under which the Company had remained a member for many years. In any event, even if the re-enrolment dated 28.02.2025 is treated as commencing a fresh qualifying period, the Company had completed the requisite one year before announcement of the 2026 election schedule and was, therefore, eligible to vote under Section 10(7).

The continued use of the same membership number is, therefore, consistent with the Company's status as an "*Old Member*" whose membership had been discontinued due to non-payment and subsequently re-enrolled, within the meaning of Section 10(7) of the Trade Organizations Act, 2013. It further distinguishes the Company from a genuinely new member being enrolled with MCCI for the first time.

10. ***<u>The impugned decision should be set aside because, on either legal route, exclusion from the 2026 voters' list is unsustainable:</u>***

If MCCI establishes lawful discontinuance of the earlier membership, the Company nevertheless completed the one-year period following re-enrolment on 01.07.2026 and is eligible under the special rule applicable to old members. Alternatively, if MCCI cannot establish compliance with Article 46(iii) for cessation/removal, its premise of automatic discontinuance is itself open to challenge. On either approach, the Company's exclusion from the final voters' list requires reconsideration and the Appellant is entitled to the relief prayed for.

<u>PRAYER:</u>

In view of the foregoing, it is most respectfully prayed that the Directorate General of Trade Organizations may kindly set aside the decision dated 07.08.2026 of the Election Commission and the underlying rejection of the Secretary General, MCCI, and direct that the name of Fatima Energy Limited be included in the Final List of Eligible Voters for the Corporate Class for the MCCI elections for the term 2026–2028, thereby enabling the Company to exercise its lawful right to vote through its Authorized Representative. Without prejudice, if the Directorate considers further factual verification necessary, the Appellant respectfully requests that MCCI be directed to produce the Executive Committee resolution fixing the relevant payment date, notice(s) issued under Article 46(iii), proof of service, any cessation/removal resolution and the relevant Register of Members entries. The Appellant further requests an opportunity of personal hearing and permission to place its complete membership record, payment record, membership certificates and MCCI correspondence before the Directorate.

Best regards,
For & on behalf of Fatima Energy Limited

Kamran Ahmad Awan
Company Secretary

Encl.: <u>As above.</u>

P.O.No.30591564 of Rs.33,000/=
dated 10.08.2026

4

BEFORE THE DIRECTOR GENERAL TRADE ORGANIZATIONS (DGTO), ISLAMABAD

Appeal under Rule 18 of the Trade Organizations Rules, 2013

In the matter of:
M/s Mehmooda Maqbool Mills Ltd., Multan — Voting Right

Appellant: Mian Aziz Ahmad Sheikh
Versus:

1. Secretary General, Multan Chamber of Commerce & Industry
2. Election Commission, Multan Chamber of Commerce & Industry
3. Bakhtawar Tanvir Sheikh, Representative in MCCI M/s Mehmooda Maqbool Mills Ltd., Multan

SUBJECT: **APPEAL AGAINST DECISION OF ELECTION COMMISSION DATED 07.08.2026 AND REQUEST TO WITHHOLD VOTING RIGHT**

Respected Sir,

It is respectfully submitted that the Appellant filed an objection/application for **suspension/withholding of the voting right of M/s Mehmooda Maqbool Mills Ltd.** on the basis of the pending ownership proceedings before the Honourable Lahore High Court, Multan Bench.

The application could not be filed before the Secretary General within the prescribed period **because the same was not received/accepted,** and the Election Commission has now dismissed the matter on the ground that the prescribed forum was not availed and that the appeal was time-barred. Copy of the Election Commission's decision dated **07.08.2026** is enclosed.

The Election Commission has failed to consider the **substantive issue arising from the order of the Honourable Lahore High Court, Multan Bench dated 27.01.2026** in Civil Original Nos. **13 of 2025 and 08 of 2025,** whereby further alienation of the property involved in the proceedings has been made subject to confirmation by the Honourable Court. The proceedings concern the **ownership/proprietary rights of the concerned firm.**

The firm's membership and consequential **voting right are valuable rights attached to its membership/ownership status.** In these circumstances, allowing the firm to exercise its vote without examining the legal effect of the pending High Court proceedings may prejudice the matter and create an irreversible electoral consequence.

PRAYER

It is therefore respectfully prayed that the DGTO may kindly:

1. **Set aside/overlook the Election Commission's decision dated 07.08.2026** in the interest of justice;
2. Direct the MCCI Election Commission/Secretary General to **withhold/suspend the voting right of M/s Mehmooda Maqbool Mills Ltd.** pending verification/determination of its legal entitlement in view of the High Court order;
3. Pass any other appropriate order deemed just and proper.

Azif.

Appellant:
Mian Aziz Ahmad Sheikh
Multan

Annexures

1. Copy of Election Commission decision dated **07.08.2026**.
2. Copy of Lahore High Court order dated **27.01.2026,** C.O. No. 13 of 2025.
3. Copy of Lahore High Court order dated **27.01.2026,** C.O. No. 08 of 2025.