

January 18, 2007

1. Rose Heaven Ball Pen Limited, Rahman Chamber (4<sup>th</sup> floor), 12-13, Motijheel C/A, Dhaka-1000.
2. Directors, Rose Heaven Ball Pen Limited, Rahman Chamber (4<sup>th</sup> floor), 12-13, Motijheel C/A, Dhaka-1000.
3. Managing Director, Rose Heaven Ball Pen Limited, Rahman Chamber (4<sup>th</sup> floor), 12-13, Motijheel C/A, Dhaka-1000.
4. Company Secretary, Rose Heaven Ball Pen Limited, Rahman Chamber (4<sup>th</sup> floor), 12-13, Motijheel C/A, Dhaka-1000.

**Sub: Non-compliance of securities laws in connection with non-submission of capital & shareholding position for the month of September 2005 within time: Warning.**

As per section 2(g) of the Securities and Exchange Ordinance, 1969(ORDINANCE No.XVII of 1969) Rose Heaven Ball Pen Limited is an issuer (herein after referred to as an "issuer").

An Order bearing No.SEC/SRMID/2004-08/1116-239 dated August 29, 2004 was issued under section 11(2) of the Securities and Exchange Ordinance, 1969 to the issuers concerned to furnish the capital and shareholding position to the Commission by tenth day of every month, but the said issuer failed to furnish the same for the month of September 2005.

Failure to submit the capital and shareholding position is a violation of the above-mentioned Order attracting penal provision of section 22 of the Securities and Exchange Ordinance, 1969.

The issuer and its directors as well as the company secretary were called for hearing on July 20, 2006 but none appeared. The issuer however submitted the said position vide letter dated July 18, 2006.

The Commission, taking into consideration of submission of the capital and shareholding position on July 18, 2006, has decided to dispose of proceedings against Rose Heaven Ball Pen Limited and others concerned for stated violation, by placing on record the Commission's dissatisfaction on the default/violation made by the company with a warning to ensure compliance of all securities related law in future.

Please note that this disposal does not absolve the issuer or any of its directors or officers concerned from their lawful responsibilities/obligations to the persons, if any, affected as a result of the issuer's above said default.

For Securities and Exchange Commission

**Mansur Alam**  
**Executive Director**

Copy for information:

Chief Executive Officer, Dhaka Stock Exchange Limited  
Chief Executive Officer, Chittagong Stock Exchange Limited

Distribution:

Executive Director (R& D), SEC  
Executive Director (SRMID), SEC  
Director (MIS), SEC, Chairman's Office