THE FEDERATION OF PAKISTAN
CHAMBERS OF COMMERCE & INDUSTRY
وفاق ایوان ہائے تجارت وصنعت - پاکستان

FPCCI.EL2027-28/2026/ 5247
November 24, 2026

THROUGH EMAIL, WEBSITE, WHATSAQPP

DECISION NO. ADD 009 (085)
PASSED BY THE SECRETARY GENERAL FPCCI

MR. MUSLIM MOHAMEDI
NOMINEE ON EC&GB CORPORATE, FROM PAKISTAN FISHERIES EXPORTERS ASSOCIATION,
PARTNER
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ENGR. M. ABDUL JABBAR
NOMINEE ON EC&GB CORPORATE, FROM PAKISTAN ASSOCIATION OF AUTOMOTIVE PARTS & ACCESSORIES MANUFACTURERS
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MR. SALMAN SALEEM
NOMINEE ON GB CORPORATE, FROM PAKISTAN ASSOCIATION OF AUTOMOTIVE PARTS & ACCESSORIES MANUFACTURERS
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SUBJECT: **REPLY TO THE OBJECTION UNDER RULE 18(4) OF THE TRADE ORGANIZATIONS RULES 2013 AGAINST THE INCLUSION OF NOMINATIONS SUBMITTED BY PAKISTAN ASSOCIATION OF AUTOMOTIVE PARTS AND ACCESSORIES MANUFACTURERS (PAAPAM) AT SERIAL NOS. 16, MR. ABDUL JABBAR (EC/GB CORPORATE) AND 17, MR. SALMAN SALEEM (GB CORPORATE) IN THE ADDITIONAL LIST OF NOMINATIONS DATED 23-11-2026, FPCCI ELECTION 2027-28.**

Contd....Page 2

This is with reference to objections received on 24th November 2026 in FPCCI Head Office Karachi, from Mr. Muslim Mohomedi, nominee on EC&GB (Corporate) from Pakistan Fisheries Exporters Association, on the nominations of Engr. Abdul Jabbar, EC&GB Corporate and Mr. Salman Saleem, GB Corporate from Pakistan Association of Automotive Parts & Accessories Manufacturers for FPCCI Elections 2027-2028.

Objection:

Objections has been raised regarding the classification of nominations, non-renewal of the License of the Association, business activities of the nominees does not relate to the association, and nominees' ineligibility and less than 50 million turnover.

FPCCI's Findings:

a) The nominations of PAAPAM Included under the directives of DGTO, vide Order F. No. 17(31)/2026 dated 16th November 2026.
b) Various documents missing of Mr. Salman Saleem, nominee on GB Corporate, which reflects that he does not prove his nomination to be valid, including, sales tax certificate, Tax Returns, and proof of turnover, NTN and membership documents, etc.

Decision by the Secretary General:

The documents of Mr. Abdul Jabbar are found in order and accepted, however, various essential required documents of Mr. Salman Saleem (GB Corporate) are missing and not in order, therefore, his nomination is excluded / rejected, as per the objections raised by the Appellant.

Brig Iftikhar Opel, SI(M), Retd
Secretary General

Copy to:

1. The Regulator of Trade Organizations (DGTO), Islamabad
2. The Election Commission, FPCCI

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SG-FPCCI 24/11
ASG(C)

FPCCI DATE 24/11/26 R. NO. 809 KARACHI

Date: 24-11-2026,

The Secretary General,
Federation of Pakistan Chamber of Commerce and Industry,
Federation House, Main Clifton Block 5,
Main Abdullah Shah Ghazi Road, Through; By Hand

Subject:- ***Objection under Rule 18(4) of the Trade Organizations Rules, 2013,against the inclusion of Mr. Abdul Jabbar, representative of m/s Pakistan Automotive MFG (Pvt.) Ltd., and Mr. Salman Saleem, CEO M/s National Automotive Components (Pvt.) ltd., both nominated by Pakistan Association of Auto Motor Parts and Accessories Manufacturers, Lahore, from the corporate class for the general body of fpcci, in the provisional voter list issued on 23-11-2026, pursuant toDGTO ~~letter dated 05-11-2026.~~***

directives.

Dear Sir,

Dear Sir,

The undersigned hereby raises the following objections against the inclusion of the above-named nominees of the Pakistan Association of Auto Motor Parts and Accessories Manufacturers (PAAPAM), Lahore, in the provisional voter list for the FPCCI Elections 2027–2028, on the grounds that both nominees have been forwarded from the Corporate Class despite their respective business concerns allegedly failing to fulfil the prescribed eligibility criteria, particularly the minimum annual turnover threshold of Rs.50 million stipulated under the definition of Corporate Class in Rule 2(g) of the Trade Organizations Rules, 2013. Furthermore, the licence of the Association has not been renewed in accordance with the statutory requirements of the Trade Organizations Act, 2013 and the Trade Organizations Rules, 2013.

1. Statutory requirements for eligibility to participate in FPCCI elections

That Article 15 of the Memorandum and Articles of Association of the Federation of Pakistan Chambers of Commerce & Industry (FPCCI) provides that the members of the Electoral College shall be eligible to vote only if they fulfil the conditions prescribed under Section 10 of the Trade Organizations Act, 2013 (hereinafter referred to as the "2013 Act") and the Trade Organizations Rules, 2013 (hereinafter referred to as the "2013 Rules").

That Rule 15(1) of the 2013 Rules, subject to the provisions of Section 10 of the 2013 Act, prescribes the following conditions for eligibility of a member of a trade organization to vote in its elections:

"(a) the member has completed two years of valid membership of the trade organization as on the date of announcement of election schedule by the executive committee of the trade organization;

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Muslim S. Mohamedi

24/11

Provided that old members shall be eligible to vote on completion of one year of their enrollment and payment of all dues; and

(b) the member has fulfilled the conditions of membership and renewal thereof of the respective trade organization under rule 11."

That the above provisions require that a person seeking representation in the FPCCI Electoral College must possess valid membership of a duly licensed trade organization and must independently fulfil the applicable conditions of membership, renewal and eligibility prescribed under the 2013 Act and the 2013 Rules.

2. Non-renewal of the licence of PAAPAM in violation of the statutory framework

That the Pakistan Association of Auto Motor Parts and Accessories Manufacturers (PAAPAM), Lahore, is required to maintain its legal status and comply with the mandatory statutory and regulatory requirements governing the licensing, renewal and functioning of trade organizations under the 2013 Act and the 2013 Rules.

However, the licence of the Association has not been renewed in accordance with the requirements of Rule 11 of the 2013 Rules and the applicable provisions of the 2013 Act. The failure to obtain the requisite renewal raises a serious question regarding the Association's subsisting legal entitlement to exercise the privileges and functions of a licensed trade organization.

That the Association cannot claim the privilege of nominating representatives to the FPCCI Electoral College without first establishing that its licence remains valid and subsisting and that it has fulfilled the mandatory statutory requirements relating to renewal and regulatory compliance.

Accordingly, the FPCCI is required to verify from the office of the Director General Trade Organizations whether the licence of PAAPAM has been validly renewed and remains in force for the relevant period. In the absence of a valid and subsisting licence, the Association cannot lawfully claim entitlement to forward nominations for participation in the FPCCI elections.

3. Corporate Class eligibility under Rule 2(g) of the Trade Organizations Rules, 2013

That Rule 2(g) of the 2013 Rules prescribes the definition and eligibility criteria of Corporate Class membership, including the applicable annual turnover threshold of Rs.50 million for the preceding financial year.

The said requirement is mandatory and cannot be dispensed with merely because a business concern is incorporated as a private limited company or the nominee holds the designation of Director or Chief Executive Officer.

The legal status of a company as a body corporate and its eligibility for membership in the Corporate Class are two distinct matters. Incorporation under the Companies Act, 2017, by

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Mushir S. Mohamedi

itself, does not establish compliance with the prescribed financial threshold under the 2013 Rules.

Consequently, each nominee forwarded from the Corporate Class must independently establish that the business concern represented by him fulfils the prescribed annual turnover requirement of at least Rs.50 million for the relevant preceding financial year.

4. Mr. Abdul Jawad, representative of M/s Kaim Automotive MFG (Pvt.) Ltd., does not fulfil the criteria for Corporate Membership (GB)

That PAAPAM has nominated Mr. Abdul Jawad to represent the Association in the General Body of the FPCCI from the Corporate Class, being associated with M/s Kaim Automotive MFG (Pvt.) Ltd.

However, the business concern represented by the said nominee does not fulfil the prescribed annual turnover threshold of Rs.50 million for the preceding financial year, as required under Rule 2(g) of the 2013 Rules.

It is submitted that the mere fact that M/s Kaim Automotive MFG (Pvt.) Ltd. is incorporated as a private limited company does not automatically confer eligibility upon its representative to claim Corporate Class membership. The nominee is required to establish that the company has achieved the minimum annual turnover prescribed under the applicable statutory framework.

In the absence of the requisite annual turnover of Rs.50 million, M/s Kaim Automotive MFG (Pvt.) Ltd. does not qualify for Corporate Class membership, and consequently, Mr. Abdul Jawad cannot validly represent the said concern as a Corporate Member of PAAPAM in the FPCCI Electoral College.

His nomination from the Corporate Class is, therefore, contrary to the requirements of Rule 2(g) of the 2013 Rules and is liable to be rejected.

5. Mr. Salman Saleem, CEO M/s National Automotive Components (Pvt.) Ltd., does not fulfil the criteria for Corporate Membership (GB)

That PAAPAM has also nominated Mr. Salman Saleem, Chief Executive Officer of M/s National Automotive Components (Pvt.) Ltd., to represent the Association in the General Body of the FPCCI from the Corporate Class.

However, the business concern represented by the said nominee also fails to fulfil the prescribed annual turnover threshold of Rs.50 million for the preceding financial year, as required under Rule 2(g) of the 2013 Rules.

It is submitted that the designation of Chief Executive Officer and the incorporation of a company under the Companies Act, 2017, do not, by themselves, establish eligibility for Corporate Class membership. The statutory financial threshold must independently be fulfilled

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Muslim S. Mohamedi

and demonstrated through the company's income tax returns, audited financial statements and other relevant financial records.

Since M/s National Automotive Components (Pvt.) Ltd. does not fulfil the prescribed annual turnover threshold, its representative cannot lawfully claim eligibility to participate in the FPCCI electoral process as a Corporate Member.

Accordingly, the nomination of Mr. Salman Saleem from the Corporate Class is equally defective and liable to be rejected.

6. Ineligibility of nominees whose underlying membership does not fulfil statutory requirements

That the Honourable Islamabad High Court, in its judgment reported as **2021 CLD 204, titled Aftab Ahmed Barlas v. Director General Trade Organizations and Others (W.P. No. 4172/2019)**, has recognized the principle that where an individual does not fulfil the legal requirements for membership of a trade organization, such individual cannot claim eligibility to represent that trade organization in the electoral process of the FPCCI.

The principle laid down by the Honourable Islamabad High Court squarely applies to the present matter. The eligibility of the nominees cannot be determined merely on the basis of nomination letters forwarded by PAAPAM or their inclusion in the provisional voter list. Their underlying membership must independently satisfy the statutory requirements, including the prescribed annual turnover threshold for Corporate Class membership.

Where the business concern itself does not fulfil the financial criteria prescribed for Corporate Membership, the consequential nomination of its representative to the FPCCI Electoral College cannot be sustained.

7. Consequences under Article 15 of the FPCCI Memorandum and Articles of Association read with Rules 11 and 15 of the 2013 Rules

That Article 15 of the Memorandum and Articles of Association of the FPCCI, read with Rule 15(1) and Rule 11 of the 2013 Rules, makes it incumbent upon the FPCCI to ensure that only duly qualified members of legally compliant and duly licensed trade organizations are included in its Electoral College.

The Association, having failed to establish renewal of its licence in accordance with the statutory requirements, cannot claim an automatic right to forward nominees for participation in the FPCCI elections.

Independently, both nominees have been forwarded from the Corporate Class despite their respective business concerns failing to meet the prescribed minimum annual turnover threshold of Rs.50 million under Rule 2(g) of the 2013 Rules.

For M. A. Mohammad & Co.

Hussain S. Motawedi

The two nominations, therefore, suffer from fundamental defects concerning the statutory eligibility of the underlying corporate members and the licensing and renewal status of the nominating Association.

PRAYER

In view of the foregoing, it is respectfully requested that:

a. The present objection may kindly be entertained under Rule 18(4) of the Trade Organizations Rules, 2013, against the inclusion of the nominees forwarded by PAAPAM in the provisional voter list issued on 23-11-2026.

b. The licensing and renewal status of the Pakistan Association of Auto Motor Parts and Accessories Manufacturers (PAAPAM), Lahore, may kindly be verified from the office of the Director General Trade Organizations, particularly whether its licence has been validly renewed and remains subsisting in accordance with the 2013 Act and the 2013 Rules.

c. The nomination of **Mr. Abdul Jawad, representative of M/s Kaim Automotive MFG (Pvt.) Ltd., from the Corporate Class (GB)** may kindly be rejected and his name deleted from the provisional voter list on account of failure of the underlying business concern to fulfil the prescribed annual turnover threshold of Rs.50 million under Rule 2(g) of the 2013 Rules.

d. The nomination of **Mr. Salman Saleem, CEO M/s National Automotive Components (Pvt.) Ltd., from the Corporate Class (GB)** may likewise be rejected and his name deleted from the provisional voter list on account of failure of the underlying business concern to fulfil the prescribed annual turnover threshold of Rs.50 million under Rule 2(g) of the 2013 Rules.

e. PAAPAM may be directed to produce the valid licence and renewal order of the Association, together with the relevant income tax returns, audited financial statements and other documentary evidence establishing that both nominated corporate concerns fulfilled the prescribed annual turnover threshold of Rs.50 million for the relevant preceding financial year.

f. Unless and until the licensing status of the Association and the individual eligibility of both nominees are established in accordance with law, they may not be permitted to participate in the FPCCI Elections 2027–2028.

The objection is submitted in the interest of transparency, legality and fairness in the electoral process of the FPCCI.

For M. A. MOHAMEDI & CO.

Muslim S. Mohamedi

Muslim Mohamedi,
EC & GB Member of FPCCI 2027-28