

Report on Lyca Group's alleged Unlawful Activities and the SRI LANKA TELECOM PLC Share Sale

Implications for the Broadcast Authority Act and National Security

Tories' Biggest Donor Lycamobile Raided In Criminal Money-Laundering Probe

10/03/2023, 17:50







Report on Lyca Group's alleged Unlawful Activities and the Sri Lanka Telecom PLC Share Sale

1.0 Executive Summary

This report presents evidence of alleged unlawful activities conducted by the Lyca Group (https://www.lycagroup.com), in Sri Lanka and raises concerns about the potential sale of shares in Sri Lanka Telecom PLC to Subaskaran Allirajah, the owner of the Lyca Group, or any of their agents, representatives, and or proxies. The founder and chairman of the Lyca Group, Subaskaran Allirajah, is accused of using his proxies to acquire media businesses in Sri Lanka, where foreign ownership is restricted. There are also concerns about potential violations of Sri Lankan laws and threats to National Security. The report calls for an investigation into the affairs of the Lyca Group in Sri Lanka and for appropriate action to be taken to uphold the rule of law in the country.

2.0 Background

Lyca Group started as a Calling Card company founded by Subaskaran Allirajah, a Sri Lankan Tamil entrepreneur. The group's primary business is Lycamobile and the bulk of its revenue is claimed to be generated from its SIM products. Lycatel, also a part of Lyca Group, targets customers within expatriate and ethnic markets that want to make international calls.



Subaskaran ALLIRAJAH Chairman - Lyca Group - UK



Premanathan AIADURAISIVASAMY Deputy Chairman - Lyca Group - UK Director – Ben Holdings - Sri Lanka



Govindasamy Thuraiappah JEYASEELAN Group COO - Lyca Group - UK Group Director – Ben Holdings - Sri Lanka

In recent years, the Lyca Group has been expanding its presence in Sri Lanka, with Allirajah acquiring media businesses in the country. However, these acquisitions have raises concerns due to the alleged use of proxies to bypass Sri Lankan laws restricting foreign ownership of media companies.

Recently, there have been reports of the potential sale of shares in Sri Lanka Telecom PLC, the country's largest telecommunications provider, to Allirajah or the Lyca Group. This has raised concerns about the potential risks associated with allowing a company with a questionable background to own a significant stake in the national telecom infrastructure.

- 1. The Lyca Group has a history of questionable business practices in various countries, as evidenced by the extensive reference list of news articles from leading news agencies and their weblinks in the "Schedule A" hereto.
- 2. Subaskaran Allirajah, the founder and chairman of the Lyca Group, was not a Sri Lankan citizen at the time that the group began acquiring media businesses in Sri Lanka on or around 2018, nor even subsequently when the respective share sales completed in 2020.

- 3. Allirajah allegedly used two employees who are citizens of Sri Lanka as proxies to acquire media businesses in Sri Lanka, where foreign ownership is restricted to 40% by way of The Gazette of the Democratic Socialist Republic of Sri Lanka (Extraordinary) dated 19.04.2002 bearing number 1232/14: Notice under the Exchange Control a copy of which is attached hereto as "Schedule B".
- 4. These two persons, namely, **Niruthan Rajasundaram** and **Govindasamy Thuraiappah Jeyaseelan**, have been named as Persons with Impermissible Security Clearance, as evidenced by the letter dated 02.12.2019 from the Ministry of Defence to the Telecommunications Regulatory Commission of Sri Lanka (TRCSL), attached hereto as "**Schedule C**".
- 5. However, as of March 2023, Rajasundaram and Jeyaseelan are the ultimate owners of the following Mass Communications businesses licensed by the Ministry of Mass Media and the TRCSL, and overseen by the Ministry of Defence:
 - i. EAP Broadcasting Company Limited (PV 2034PB) Swarn
 - **Swarnavahini** | 3 Radios
 - ii. MGMR Network (Private) Limited (PV 14475)
- Max TV | Max Radio
- iii. VIS Broadcasting (Private) Limited (PV 63832)
- Sitha FM | 4 Radios | 1 TV



- 6. It is imperative to highlight that Subaskaran Allirajah has executed his acquisition in a meticulous manner. Specifically, he has attained complete control of the aforementioned Mass Communications businesses through 3 distinct holding companies, which are held through employees of the Lyca Group: Rajasundaram and Jeyaseelan. Notably, they have evaded the Ministry of Defence's scrutiny by abstaining from representation on the boards of directors of the companies that operate the Mass Communications businesses. The graphical representation of the media network ownership structure is aptly depicted in "Schedule D" attached herewith.
- 7. Attention is drawn to the recent events in Chennai, India, wherein the offices of Lyca Productions were subjected to a raid by Indian authorities on May 16, 2023. According to the prominent Indian newspaper, Hindustan Times, the company is accused of committing various criminal offenses, including fraud, criminal misappropriation, criminal breach of trust, cheating, etc. For your reference, please find attached herewith "Schedule E", which extract

 About Usontains other recent events in Chennai, India, wherein the offices of Lyca Productions were subjected to a raid by Indian authorities on May 16, 2023. According to the prominent Indian newspaper, Hindustan Times, the company is accused of committing various criminal breach of trust, cheating, etc. For your reference, please find attached herewith "Schedule E", which extract 30/03/2023, 23:56

ASout Niruthan, Rajasundaram, who currently holds the position of director and shares in all 3 haldings, 23:56



About Lyca Productions

Lyca Productions is an Indian entertainment company, which was established by Subaskaran Allirajah in 2014. A subgroup of Lycamobile, the production studio has been involved in the production and distribution of films made in South India. The Vision of Lyca is to create, promote and release content across varying genres.

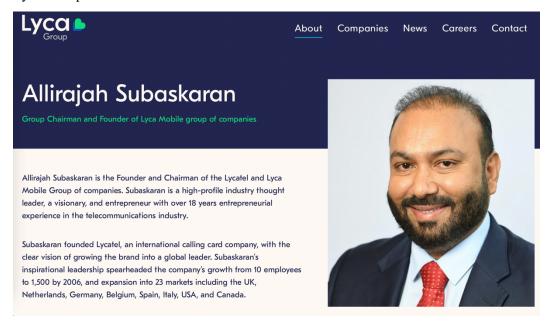




- 10. These facts substantiate that the individuals accused of committing various criminal offenses in India, including fraud, criminal misappropriation, criminal breach of trust, cheating, and similar offenses, are the same individuals who control the largest media network in Sri Lanka.
- 11. Therefore, it is imperative to pay attention to the news item in Schedule C and the reason behind the aforementioned raid that took place in India on the Lyca Productions in Chennai and the alleged criminal history of the Lyca Group. In addition to these activities and the history of Lyca Group including allegations of money laundering, tax evasion, and bribery, it is evident that the Lyca Group has engaged in activities that may potentially threaten the National Security and circumvent the laws of Sri Lanka.
- 12. Further, there are allegations of Money Laundering against Lyca's Gnanam Foundation in Sri Lanka, headed by Niruthan Rajasundaram as the President. Lyca's Gnanam Foundation was established by Subaskaran Allirajah and funded exclusively by the Lyca

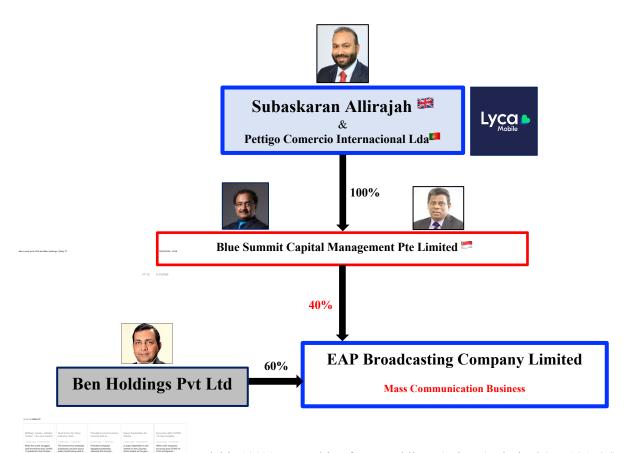


- Subaskaran Allirajah and funded exclusively by the Lyca Group. Currently there are two (2) cases in the Magistrate's Court of Colombo, bearing Case Numbers 34186/3/20 and 58950/1/21, relating to Money Laundering in Sri Lanka and subsequent coverups.
- 13. The acquisition of the above 3 Mass Communications businesses to create the largest Media Network in Sri Lanka by Subaskaran Allirajah and the Lyca Group through these 3 persons raises concerns about potential violations of Sri Lankan laws, particularly with regard to foreign ownership restrictions and the threats to the National Security.
- 14. Firstly, the deceitful manner in which Subaskaran Allirajah and his Lyca Group acquired the subsidiaries of Edirisinghe Trust Investment (ETI), including Swarnamahal Jewellers Ltd., EAP Films and Theatres Ltd., and EAP Broadcasting Company Ltd through Ben Holdings in Sri Lanka and Blue Summit Capital Management Pte Ltd of Singapore should be understood.
 - i. It is public information that Subaskaran Allirajah is the Group Chairman and Founder of Lyca Group.



ii. Note 24 - Related Party Transactions in the Annual Report and Financial Statements for the year ended 31 December 2021 of Lycamobile UK Limited gives an insight into the web of companies related to Subaskaran Allirajah. Pages 38 to 40 containing the said "Note 24" is given in the said "Schedule G" attached herewith.

- iii. **Pettigo Commercio Internacional Lda**, a company registered under the NIPC (Collective person/Registration identification number): 511249977 in the municipality of Funchal, in the District of Madeira, Portugal a Tax Haven approved by the European Commission is the primary Money Laundering vehicle of Subaskaran Allirajah, although he is not a Director or a Shareholder.
- iv. However, his wealth is held by his wife, Prematharshini Saravanthasivam with the Deputy Chairman of Lyca Group, Premanathan Aiaduraisivasamy and the CEO of Lyca Group, Christopher Donald Michael Tooley, with shares held by Prematharshini Saravanthasivam being further transferred to various other fronts, exposing the companies of a larger criminal network, meticulously interwoven by Subaskaran Allirajah and his team.
- v. A copy of the Permanent Certificate for Pettigo Commercio Internacional Lda and its historical records under the Access Code: 5846-5375-5507, from the Government of Portugal is given in the "Schedule H" attached herewith.
- vi. Pettigo Commercio Internacional Lda owns 100% of Blue Summit Capital Management Pte. Ltd of Singapore, that in turn owns 40% of EAP Broadcasting Company Limited (EBC). A copy of the Business Profile of Blue Summit Capital Management Pte. Ltd from the Accounting and Corporate Regulatory Authority (ACRA) of Singapore is given in the "Schedule I" attached herewith.



vii. Alex Lovell, through his 100% ownership of Ben Holdings (Private) Limited (PV 131586),

partnered with Blue Summit Capital Management Pte. Ltd of Singapore, to win the bid to
own the assets under the Edirisinghe Trust Investment (ETI) at USD 75 Million against
local bidders, which put forward a bid of USD 61 Million in second place, which included
Swarnamahal Financial Services PLC (SFSP).

- viii. However, as reported in the below links, the transaction to acquire the companies under ETI has been amended to exclude Swarnamahal Financial Services PLC (SFSP), which had a deposit base of Rs. 3.5 Billion (approximately USD 20 Million), which would have been the responsibility of the new owners for the settlement of the Depositors of SFSP, requiring an additional capital infusion of such an amount on top of the bid amounts, i.e., (in the case of Ben Holdings and Blue Summit Capital Management, USD 75 Million + USD 20 Million = USD 95 Million).
 - a. Sri Lanka's ETI Finance last tranche expected this month (Monday July 9, 2018) https://economynext.com/sri-lankas-eti-finance-last-tranche-expected-this-month-10774/
 - b. ETI Finance issues statement to clarify misinformation (Saturday, 16 February 2019) https://www.ft.lk/Front-Page/ETI-Finance-issues-statement-to-clarify-misinformation/44-672994
 - c. ETI Crisis Deepens (4 years ago) https://www.themorning.lk/articles/24929

Alex Lovell receives Special Recognition award at BT TOP 30 for attracting investments to SL | Daily FT

10/03/2023. 15:2

- ix. It is reported that by later removing Swarnamahal Financial Services PLC (SFSP) from the deal, The initial investment of USD 75 million was later reduced to USD 70 million as they (investors) decided to exclude Swarnamahal, which was allegedly valued at USD 5 million.
- x. By manoeuvring through the transaction as explained above, Ben Holdings and Blue Summit Capital Management Pte Ltd, have cheated the SFSP depositors by evading the responsibility of them having to settle the SFSP depositors, subsequent to overbidding the local bidders, then



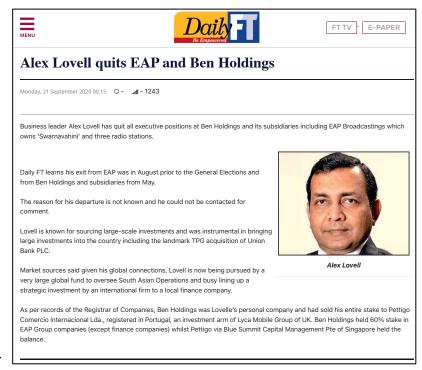
switching gears. It is rumoured that the USD 5 Million has been paid as a bribe to save the additional liability of USD 20 Million or the Rs. 3.5 Billion depositors' money.

- xi. Ben Holdings and Lyca Group has a history of using such procedures to cheat, subsequent to entering into agreements and later breaching by delays to apply economic duress on the target assets and applying undue influence on the owners and directors of target companies.
- xii. Unfortunately, the Central Bank of Sri Lanka (CBSL) is left with the burden of settling the SFSP depositors, with CSBL recently issuing a notice on 08.06.2023 stating that the payment of compensation will recommence from 09.06.2023 and is expected to continue until 12.07.2024.



 $\frac{https://www.dailymirror.lk/breaking\ news/Compensation-payment-to-Swarnamahal-Financial-Services-depositors-resumes-today/108-260743}{$

15. Moreover, there are allegations that Ben Holdings, which was initially fully owned only by Alex Lovell said to have been involved in economic duress against companies targeted and, furthermore, it is reported that undue pressure was exerted on the former owners of the aforementioned Mass Communications businesses, including Alex Lovell himself, prior to the complete acquisition of 100% of



the shares of all three media networks by the group of companies held by Rajasundaram and Jeyaseelan. It is important to note that these companies are ultimately owned and completely controlled remotely by Sub Stud farms for dairy

16. It is alleged that, on or arout hearing number 517815908 hearing number 517815908 hearing number 517815908

Lankan citizens.

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dismissed concerns about
public funds being used to ...

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President Gotabaya
Rajapaksa yesterday
stressed that tourism ... 2 years ago 2 comments

A super September it was indeed for the Colombo stock market as the gain ... What is the viewpoint economy post COVID-19 from homegrown ... however, the actions of the Lyca Group owned by him raise concerns about the threat to the integrity of the laws of the country and regulations, as well as the safety and security of Sri https://www.ft.lk/front-page/Alex-Lovell-quits-EAP-and-Ben-Holdings/44-706293
Military, monks, militant
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19: Key insights

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- 17. This report provides clear evidence that the Lyca Group has had allegedly engaged in questionable transactions related to the Mass Communications businesses in Sri Lanka and their history of questionable business practices in various countries, which raises serious concerns about the ethics and business practices of Subaskaran Allirajah and the Lyca Group.
- 18. In addition, the economic duress and undue pressure on the previous owners of the Mass Communications businesses and the exit of Alex Lovell, raise further questions about the Lyca Group's ethics and its willingness to engage in unethical and illegal activities to achieve its goals.
- 19. The manner in which Subaskaran Allirajah has seized control of 3 Mass Communications businesses to create the largest Media Network in Sri Lanka demonstrates a blatant disregard for Sri Lankan laws and regulations.
- 20. Currently, the management of all Mass Communication businesses acquired by the Subaskaran Allirajah and others are carried out by Ben Holdings, headed by the most senior officer of Lyca Group based in Sri Lanka, Govindasamy Thuraiappah Jeyaseelan, a Person with Impermissible Security Clearance with the designation of "Group Director" of Ben Holdings.
- 21. With all decision-making being centralised at Ben Holdings, which is an acceptable method for better control in business, the concern is that Ben Holdings and all Mass Communications businesses are fully owned by Person with Impermissible Security Clearance, with one of them controlling the largest Media Network in Sri Lanka as an "Authorised Signatory",

22. Companies within the nexus of the Mass Communications business ownership structure of the Lyca Group as given in Schedule D hereto, are as follows:

i.	VIS Broadcasting (Private) Limited	-	PV 63832
ii.	MGMR Network (Private) Limited	-	PV 14475
iii.	EAP Broadcasting Company Limited	-	PV 2034PB
iv.	Asia Infotech Services (Private) Limited	-	PV 117106

v. Zentel Holdings (Private) Limited - PV 00209388

vi. Sky Media Network (Private) Limited - PV 19359

vii. Ben Holdings (Private) Limited - • PV 131586











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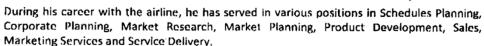


Brief Profile - Mr G.T Jeyascelan (B.Sc, MBA)

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Mr G T Jeyaseelan graduated from the University of Jaffna, Sri Lanka offering Mathematics and Statistics and holds an MBA from Concordia University Montreal. He Joined Sri Lankan Airlines, then known as Air Lanka in 1980 and has been with the company until his retirement in 2014 counting over 34 years with the Company. At the time of his retirement he was the Chief Marketing Officer responsible for Marketing, Airport Operations and Inflight Services. Presently he is the Group Chief Operating Officer of Lyca Group in the UK.

Show all activity →



He has served as the airline's country Manager in Saudi Arabia, UAE & Bahrain, Germany & Austria, Japan & Korea, China and Sri Lanka & Maldives.

Media, Retail and Entertainment

As the Group Chief Operating Officer of Lycamobile UK, , he is responsible for the Group's operations in 22 countries and looks after F n Resources, Information Technology and Marketing at its Head Quarters.

He serves as a member of the Board of Directors of Williams and Blue Summit Capital Management.

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3.0 Recent Developments

- 1. According to reports, Subaskaran Allirajah is planning to buy state-owned shares in Sri Lanka Telecom PLC and Lanka Hospitals PLC. This move, if approved, would further expand the Lyca Group's influence in Sri Lanka.
- 2. Sri Lanka All Telecommunication Employees Union filed a Fundamental Rights petition in Supreme Court seeking an order restraining the Treasury Secretary from taking any steps to divest the shares held by him in Sri Lanka Telecom PLC, but was dismissed on 15.06.2023.
- 3. The Sectoral Oversight Committee on National Security has raised concerns that privatizing SLT could be detrimental to National Security.
- 4. A major political divide has emerged on the privatization of SLT, with various parties expressing concerns about the potential risks associated with allowing the Lyca Group to own the national telecom infrastructure.
- 5. **SPECIAL ATTENTION**: Starting from 12th June 2023, Lycamobile, a part of the Lyca Group, is facing trial in France for money laundering and VAT fraud. The company is accused of using prepaid phone cards as instruments for money laundering, having allegedly laundered more than 17 million euros in seven months. For your reference, please find attached herewith "**Schedule J**", which contains the aforementioned newspaper article for your perusal.

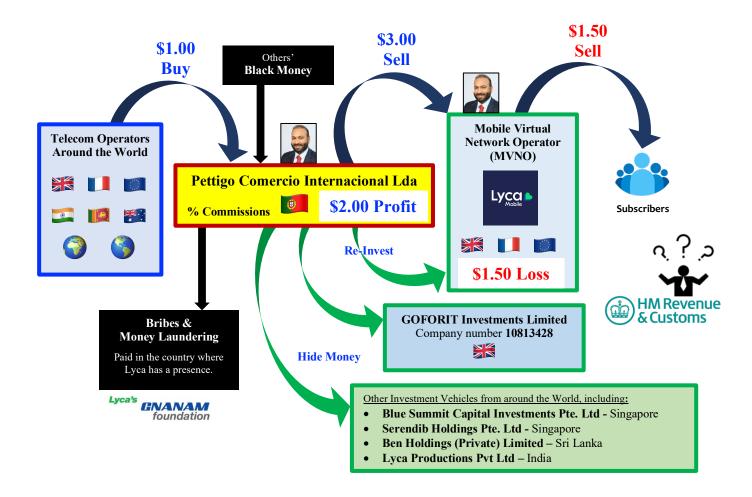
4.0 Allegations against Lyca Group

- 1. **Bypassing Foreign Ownership Restrictions in Sri Lanka:** The Lyca Group has been accused of using proxies to bypass the country's laws that restrict foreign ownership of media companies. This has led to concerns about their commitment to transparency and adherence to local regulations.
- 2. **Money Laundering Allegations:** The Lyca Group has faced allegations of involvement in money laundering activities, which have led to calls for investigations into their financial dealings in Sri Lanka. These allegations, if proven true, could pose significant risks to the integrity of the country's financial system.
- 3. **Tax Fraud Allegations:** The company has also been accused of tax fraud, with reports suggesting that it has evaded paying taxes in several countries where it operates. This raises concerns about their commitment to ethical business practices and compliance with tax regulations.
- 4. **Unlawful Activities and Regulatory Issues:** The Lyca Group has been linked to various unlawful activities, including the sale of unregistered SIM cards and the violation of customer privacy. Additionally, the company has faced fines and penalties in multiple countries for noncompliance with telecommunications regulations, which raises questions about their ability to manage a national telecom infrastructure responsibly.

These concerns and allegations highlight the potential risks associated with allowing the Lyca Group to control Sri Lanka Telecom PLC. It is crucial to consider these risks when evaluating the potential sale of shares in the company to the Lyca Group or any of its affiliates.

5.0 The Money Laundering Machine of Subaskaran Allirajah & Co

- 1. Lyca Group has faced allegations of Money Laundering and Tax Fraud in various jurisdictions, and the heart of the network is **Pettigo Commercio Internacional Lda** registered in the Tax Haven on the Portuguese island of Madeira.
- 2. For example, Pettigo Commercio Internacional Lda engages in money laundering activities through their business operations, by buying calling minutes from British Telecom and other global telecom infrastructure operators for a hypothetical amount of USD 1.00. Pettigo then sells these minutes to Lycamobile for USD 3.00, generating a profit of USD 2.00 from related-party transactions. Lycamobile, in turn, sells a minute for USD 1.50, thereby reporting a loss of USD 1.50 in the country they operate in to evade taxation.
- 3. Pettigo then reinvests the profits back into Lycamobile, and the excess is hidden in various investment vehicles around the world to acquire assets and finance movie productions. This scheme not only allows the companies to evade taxation but also facilitates money laundering by obscuring the origin of the funds. Pettigo's network also used for other criminal activities, including Money Laundering.
- 4. The following diagram with hypothetical figures in US Dollars demonstrates the money laundering process involving Lycamobile and Pettigo Commercio Internacional Lda. Governments and regulatory authorities must be vigilant in scrutinizing the business practices of such companies to ensure the safety and stability of the nations they operate in and protect their citizens and critical national infrastructure from the potential dangers associated with money laundering and other illicit activities.



6.0 Lyca Group's Complex Structures

Based on the information provided above and the shared links in Schedule A, it appears that the Lyca Group has been involved in various activities that raise concerns about their business practices, including the use of complicated structures, circular operations, and alleged connections to organized crime. Here are some key findings:

- 1. **Complex Corporate Structures:** The Lyca Group has been known to use complex and opaque corporate structures, which can make it difficult for authorities to trace the flow of funds and identify the ultimate beneficial owners of the company. This lack of transparency can facilitate money laundering and other illicit activities.
- 2. **Offshore Entities and Tax Evasion:** Subaskaran Allirajah's offshore empire has faced investigation as part of an international probe into allegations of corruption and tax evasion. Offshore entities can be used to conceal the true ownership of assets, making it easier for individuals and organizations to evade taxes and launder money.
- 3. **Circular Operations and Money Laundering Allegations:** Lycamobile has been accused of engaging in circular operations, where funds are transferred between different entities within the group, making it difficult to trace the source and destination of the funds. This practice can be used to disguise the origin of illicit funds and facilitate money laundering.
- 4. **Alleged Connections to Organized Crime:** Lycamobile's alleged involvement in money laundering, tax fraud, and unlawful activities raises concerns about potential connections to other international criminal and terrorist networks.

7.0 Key Risks of Allowing Lyca Group to Own National Telecom Infrastructure

Given the alleged unlawful activities and nefarious background of the Lyca Group, allowing them to own shares in Sri Lanka Telecom poses significant risks to the country. These risks include:

- 1. **National Security Threats:** National Security is a top consideration for national telecom infrastructure ownership. Allowing a business with nefarious activities to own a national telecom infrastructure may compromise the security of the nation.
- 2. **Privacy and Security of Citizens:** Allowing the Lyca Group to own a national telecom infrastructure may compromise the privacy and security of citizens and critical information.
- 3. **Violation of Privacy and Civil Liberties:** Facial recognition and other advanced technologies enabled by 5G could violate privacy and civil liberties, especially if the national telecom infrastructure is owned by a business with a history of unethical activities.
- 4. **Money Laundering Concerns:** Money laundering is a significant risk associated with allowing a business with nefarious activities to own a national telecom infrastructure.
- 5. **Facilitation of Terrorist Activities:** A business with nefarious activities that owns a national telecom infrastructure could facilitate terrorist activities.

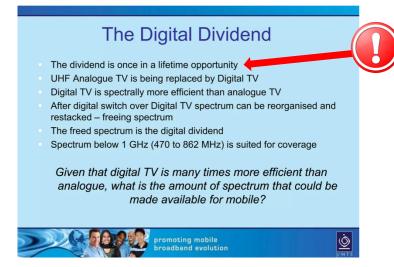
8.0 Considerations

Based on the extensive analysis of the concerns and allegations surrounding Subaskaran Allirajah and the Lyca Group, we strongly recommend that the Government of Sri Lanka refrain from selling the shares owned by the Treasury in Sri Lanka Telecom PLC to Subaskaran Allirajah, Lyca Group, or any of their agents, representatives, or proxies.

Our recommendation is based on the following key findings:

- 1. Lack of Transparency and Bypassing Foreign Ownership Restrictions: The Lyca Group has been accused of using proxies to bypass foreign ownership restrictions in Sri Lanka, raising concerns about their commitment to transparency and adherence to local regulations.
- 2. **Money Laundering and Tax Fraud Allegations:** Both Subaskaran Allirajah and the Lyca Group have faced allegations of involvement in money laundering and tax fraud, which, if proven true, could pose significant risks to the integrity of Sri Lanka's financial system.
- 3. **Unlawful Activities and Regulatory Issues:** The Lyca Group has been linked to various unlawful activities, including the sale of unregistered SIM cards and the violation of customer privacy. Additionally, the company has faced fines and penalties in multiple countries for noncompliance with telecommunications regulations, raising questions about their ability to manage a national telecom infrastructure responsibly.
- 4. **Alleged Connections to the LTTE:** Subaskaran Allirajah has faced allegations of having connections to the LTTE, a terrorist organization that sought to establish an independent state in Sri Lanka. While these claims have not been substantiated with concrete evidence, they raise concerns about the potential risks associated with allowing the Lyca Group to control Sri Lanka Telecom PLC.
- 5. Potential Loss of Revenue from the 700 MHz Spectrum Auction: As Sri Lanka moves towards the digitalization of TV broadcasting, the country has amassed a significant number of TV frequencies suitable for 5G broadband services. However, the potential acquisition of Sri Lanka Telecom by the Lyca Group, a company with a history of bribery allegations, could jeopardize the auctioning of the remaining spectrum from these TV frequencies. A possible merger between Lyca-owned media networks and Sri Lanka Telecom PLC may lead to the deprivation of valuable revenue for the country, as it could hinder the transparent and competitive auctioning process for the 700 MHz spectrum.





9.0 The Potential Threats of Lyca Group owning the Largest Media Network

- 1. **Alleged Connections to Terrorism**: Lyca Group's chairman has been accused of funding the LTTE, a terrorist organization, in the past. This raises concerns about the potential misuse of media influence to propagate harmful content or incite violence.
- 2. **Concentration of Media Power**: The ownership of the largest media network by a single group can lead to a concentration of media power, which may result in biased reporting and the suppression of diverse viewpoints.
- 3. **Political Influence**: The involvement of Lyca Group in Sri Lanka's media landscape could potentially lead to political influence and manipulation of public opinion, as seen in other cases of media ownership concentration.
- 4. **Erosion of Journalistic Standards**: The ownership of a large media network by a group with controversial connections may contribute to the erosion of journalistic standards and the spread of misinformation.
- 5. **Economic Influence**: A large media network owner like Lyca Group could leverage its economic power to influence government policies and regulations in its favour, potentially compromising the public interest and distorting the media landscape.
- 6. **Loss of Local and Cultural Content**: With foreign ownership of a significant media network, there is a risk of losing locally relevant and culturally sensitive content. This could lead to a homogenization of media content and a reduction in the representation of diverse voices and perspectives from different communities within Sri Lanka.
- 7. **Lack of Accountability**: A powerful media network owner like Lyca Group might be less likely to be held accountable for its actions due to its economic and political influence. This could result in a lack of transparency and accountability in the media landscape, further eroding public trust and undermining the role of the media as a watchdog for democracy.

10.0 The Potential Threats of Lyca Group taking control of SLT.

The potential sale of the Government's shares of Sri Lanka Telecom PLC (SLT) to fully privatize the company may seem like a financially attractive option; however, National Security concerns must take precedence. Sri Lanka has a history of dealing with internal conflicts and separatist movements, most notably the Liberation Tigers of Tamil Eelam (LTTE). The potential risks associated with the privatization of SLT outweigh the financial benefits, and it is crucial to prioritize the security and stability of the nation. In particular, the consideration of the sale of SLT to Lyca Group, owned by Subaskaran Allirajah, their nominees, agents, representatives, or proxies raises concerns about their qualifications and potential implications for National Security.

National Security Threats

- Cybersecurity: Privatizing SLT could lead to weaker cybersecurity measures, as
 private companies may prioritize profits over robust security measures. This could
 make the nation's telecommunications infrastructure more vulnerable to cyberattacks
 by separatist groups or hostile foreign actors, potentially disrupting essential services
 and endangering National Security.
- 2. Foreign Influence: Privatization may result in foreign companies gaining control or influence over SLT, which could pose a significant risk to National Security. Foreign entities may have interests that do not align with Sri Lanka's, and this could lead to the manipulation of the country's telecommunications infrastructure for their benefit. The involvement of Subaskaran Allirajah and the Lyca Group raises further concerns about their potential influence on National Security and the possible implications of their corporate interests on Sri Lanka's telecommunications infrastructure.
- 3. Control Over Critical Infrastructure: The government's control over SLT allows for better oversight and regulation of the national telecommunications infrastructure. Fully privatizing SLT could reduce the government's ability to monitor and protect this critical infrastructure, leaving it more vulnerable to infiltration and sabotage by separatist groups or other hostile actors. The qualifications and intentions of Subaskaran Allirajah and the Lyca Group in managing and protecting critical national infrastructure must be carefully scrutinized.
- 4. **Emergency Response and Disaster Management**: In times of crisis, such as natural disasters or terrorist attacks, the government's control over SLT ensures efficient coordination and response. Privatization could hinder the ability to effectively manage emergency situations, as private companies may not prioritize National Security and public safety over their own interests.

In light of Sri Lanka's recent history and the ongoing threat posed by separatist groups, National Security must be the primary consideration in any decision regarding the privatization of SLT. The potential risks associated with full privatization, including increased cybersecurity vulnerabilities, foreign influence, loss of control over critical infrastructure, and weakened emergency response capabilities, outweigh any financial benefits.

Furthermore, the involvement of Subaskaran Allirajah and the Lyca Group raises concerns about their qualifications and intentions, which must be thoroughly investigated to ensure the safety and stability of the nation.

11.0 Recommendations

Considering the serious concerns and allegations surrounding Subaskaran Allirajah and the Lyca Group, we strongly recommend the following actions to the Government of Sri Lanka:

- 1. Investigate the Lyca Group's activities in Sri Lanka: Conduct a thorough and comprehensive investigation into the Lyca Group's operations, business practices, and potential violations of Sri Lankan laws. This should include a detailed examination of their complex corporate structures, alleged involvement in money laundering, tax fraud, and any connections to organized crime or the LTTE.
- 2. **Revoke the Share Transfers**: Deem the share transfers related to the ownership of the three Mass Communications businesses, which were carried out to transfer shares to Niruthan Rajasundaram and Govindasamy Thuraiappah Jeyaseelan, as invalid. These transfers appear to be in violation of Sri Lankan laws and regulations and should be reversed to protect the integrity of the country's media sector.
- 3. Collaborate with International Authorities: Work closely with international authorities and organizations, such as the International Monetary Fund (IMF) and the Financial Action Task Force (FATF), to combat money laundering, terrorism financing, and other illicit activities that may be facilitated by complex corporate structures and offshore entities. This collaboration will help enhance the transparency and credibility of Sri Lanka's regulatory environment.
- 4. Guarantee Transparency in Identifying Ultimate Beneficiaries of Potential Buyers: To prevent the recurrence of the deceptive methods employed by the Lyca Group to acquire multiple media companies in Sri Lanka and circumvent the country's laws and regulations, it is imperative that the Government of Sri Lanka ensures transparency regarding the ultimate beneficiaries in any potential sale of shares of Sri Lanka Telecom PLC. Given Lyca Mobile's complex structures and use of various fronts, the government must diligently scrutinize the financing sources and ultimate beneficiaries of any potential share sale. This will help thwart any attempts by the Lyca Group to establish or acquire smaller companies and employ convoluted structures with multiple levels and proxies to gain control over Sri Lanka Telecom.
- 5. Seek Established Companies Owning and Operating Telecom Infrastructure: We strongly encourage the government to consider alternative investors who have a proven track record of compliance with regulations, a commitment to transparency, and a reputation for providing high-quality telecommunications services. This will promote fair competition and safeguard the interests of the Sri Lankan people.
- 6. **Strengthen the Regulatory Framework for Spectrum Auctions**: Implement robust regulatory measures to ensure a transparent, competitive, and fair auction process for the 700 MHz spectrum.
- 7. **Promote Public Awareness and Transparency**: Increase public awareness about the importance of the 700 MHz spectrum auction and its potential impact on the country's economy and telecommunications sector.

By implementing these recommendations, the Government of Sri Lanka can effectively address the concerns surrounding the potential revival of the LTTE, safeguard the media sector, and ensure the optimal utilization of the valuable 700 MHz spectrum. This will contribute to the country's long-term peace, stability, and economic growth while promoting transparency, accountability, and fair competition in the telecommunications sector.

12.0 The Broadcasting Authority Act and Protection from Potential Threats

1. The Broadcasting Authority Act aims to regulate the media landscape in Sri Lanka.

2. The Lyca Group and Potential Threats

The Lyca Group's ownership of the largest Media Network in Sri Lanka raises concerns due to its enormous financial strength and alleged links to criminal activities, including terrorism financing. Potential threats posed by the Lyca Group include:

- i. Propagation of extremist ideologies or incitement to violence
- ii. Concentration of media power, leading to biased reporting and suppression of diverse viewpoints
- iii. Political influence and manipulation of public opinion
- iv. Erosion of journalistic standards and spread of misinformation.

3. The Broadcasting Authority Act: A Tool for Protection

The Broadcasting Authority Act can serve as a tool for the government to protect against potential future threats posed by nefarious groups like the Lyca Group. The act could achieve this by focusing on the following key areas:

i. Establishing a Transparent and Independent Regulatory Body

The act should mandate the creation of a transparent and independent broadcasting regulatory body, with members appointed through a bipartisan process. This would help ensure impartiality and prevent potential political interference in the regulation of media outlets, thereby safeguarding the media landscape from undue influence by powerful groups.

ii. Clear Guidelines on Prohibited Content

The act should include clear guidelines on prohibited content, such as incitement to violence, hate speech, and content likely to cause racial or communal disharmony. These guidelines should be specific and narrowly defined to prevent misuse and ensure that they do not infringe on legitimate freedom of expression. This would help protect against the spread of harmful content by nefarious groups.

13.0 The Potential Revival of the LTTE

The Liberation Tigers of Tamil Eelam (LTTE), a separatist organization that sought to establish an independent Tamil state in Sri Lanka, was militarily defeated in 2009. However, recent incidents and intelligence reports suggest that there might be a potential revival of the LTTE and its separatist agenda. This essay examines the recent developments related to the LTTE, discusses the possible threats that could arise in the future, and explores the implications for media regulation in Sri Lanka, particularly in the context of the proposed Broadcasting Authority Draft Bill.

Recent Developments:

1. Regrouping and Launching Attacks

In October 2021, Sri Lanka announced that it would investigate reports of ex-LTTE members regrouping to launch attacks in the country, based on information provided by Indian intelligence agencies.

2. Interception of a Drug and Arms Laden Boat

In August 2021, a boat carrying drugs and rifles was intercepted by Indian Coast Guard, leading to an investigation that suggested a possible revival of the LTTE in Kerala and Tamil Nadu.

3. Continued Threats to Sri Lanka

In January 2021, the Secretary of Defence of Sri Lanka warned that the country is still under threat from LTTE sympathizers abroad who are striving to achieve the separatist ideology in the country.

4. Alleged LTTE Links to Powerful Entities

Subaskaran Allirajah, the founder of Lycamobile and owner of the largest media network in Sri Lanka, has faced allegations of having connections to the LTTE. These allegations raise concerns about the potential influence of powerful entities on the media landscape and the need for effective regulation to prevent undue interference.

Potential Threats in the Future:

1. Terrorist Attacks

If the LTTE manages to regroup and reorganize, they could potentially launch terrorist attacks in Sri Lanka, targeting government institutions, security forces, and civilians.

2. Recruitment and Radicalization

The LTTE could attempt to recruit and radicalize disaffected Tamil youth, both in Sri Lanka and abroad, to further their separatist agenda. This could lead to an increase in the number of individuals willing to participate in violent activities in support of the LTTE.

3. Transnational Criminal Activities

The LTTE has historically been involved in various transnational criminal activities, such as drug trafficking and arms smuggling. A resurgence of the LTTE could lead to an increase in such activities, posing a threat not only to Sri Lanka but also to the region and the international community.

4. Political Instability

A revival of the LTTE and its separatist agenda could result in political instability in Sri Lanka, as it could reignite ethnic tensions between the Sinhalese majority and the Tamil minority.

14.0 Implications for Media Regulation in Sri Lanka

The potential revival of the LTTE and its impact on powerful entities with alleged connections to the organization, such as Subaskaran Allirajah and the Lyca Group, highlight the need for effective media regulation in Sri Lanka. The proposed Broadcasting Authority Draft Bill should be revised to address these concerns and balance the influence of powerful entities.

1. A More Inclusive and Transparent Appointment Process

To ensure a diverse and unbiased Commission, the appointment process should include a broader range of stakeholders and be conducted in a transparent manner. This would help prevent undue influence from powerful entities and address concerns about the method of appointments to the Commission.

2. Clear Definitions and Interpretations

The draft bill should provide clear definitions and interpretations of key provisions to avoid ambiguity and potential misuse. This would address concerns about vague definitions and interpretations, such as the lack of definition for "abuse of power" and the inclusion of "national economy" as a criterion for potential violations.

3. Safeguarding Freedom of Expression

The bill should strike a balance between regulating content and safeguarding freedom of expression. Restrictions on content should be narrowly defined and proportionate to the objectives of the legislation, ensuring that they do not infringe on legitimate freedom of expression. This would help address concerns about the threat to freedom of expression and the Commission's ability to dictate and enforce strict social and cultural boundaries on broadcasters.

4. A Fair and Transparent Complaints Investigation Process

The draft bill should provide clear guidelines on the establishment of a committee for investigating complaints, including the selection of committee members and the process for handling complaints. This would address concerns about the committee for investigating complaints and ensure a fair and transparent process for addressing grievances.

The potential revival of the LTTE and its separatist agenda is a cause for concern for Sri Lanka and the international community. It is essential for the government, security forces, and intelligence agencies to remain vigilant and take appropriate measures to counter any attempts to revive the LTTE. Furthermore, addressing the underlying grievances of the Tamil population through political and social reforms could help to prevent the resurgence of the LTTE and ensure long-term peace and stability in Sri Lanka. In this context, revising the proposed Broadcasting Authority Draft Bill to address concerns related to media regulation and the influence of powerful entities with alleged connections to the LTTE is crucial for safeguarding democratic values and promoting accountability.

15.0 Conclusion

Given the alleged unlawful activities of the Lyca Group and the risks associated with allowing them to control Sri Lanka Telecom PLC, it is strongly recommended that the sale of shares in Sri Lanka Telecom PLC to Subaskaran Allirajah, the Lyca Group, or any of their agents, representatives, or proxies be objected.

Money laundering can undermine the integrity of financial systems and facilitate criminal activities, such as drug trafficking, terrorism financing, and corruption. The potential involvement of the Lyca Group in money laundering activities raises concerns about the integrity and transparency of the company, as well as the potential risks associated with their business dealings.

The allegations and concerns surrounding Subaskaran Allirajah and the Lyca Group are deeply troubling and pose significant risks to the trust and reconciliation efforts between Sri Lankans and the Tamil Diaspora.

Given all of the above, there are serious apprehensions that providing citizenship to an individual with such accusations may harm the trust and reconciliation efforts between Sri Lankans and the Tamil Diaspora. In addition, Sri Lanka may potentially become the hub for illegal activities of Subaskaran Allirajah and the Lyca Group, worsening the corrupt practices of the country with potential consequences for the National Security.

The alleged money laundering activities of the Lyca Group not only raise questions about the company's commitment to ethical business practices but also cast doubt on their suitability as a potential buyer of shares in critical national infrastructure, such as Sri Lanka Telecom PLC (SLT). The Government of Sri Lanka must thoroughly investigate these allegations to ensure that any sale of shares in these companies does not inadvertently facilitate money laundering or undermine National Security.

By taking swift and decisive action to investigate the affairs of the Lyca Group in Sri Lanka, the government must safeguard National Security and prevent future violations of the country's laws. It is crucial for the relevant authorities to address these concerns in a thorough and transparent manner, demonstrating their commitment to upholding the rule of law and protecting the interests of the citizens of Sri Lanka.

The International Monetary Fund (IMF) has been actively involved in the fight against money laundering and terrorism financing. The IMF's efforts include assisting countries in strengthening their legal frameworks, improving financial sector supervision, and enhancing the transparency of financial transactions. These efforts aim to prevent and combat the financing of terrorism and other illicit activities that pose threats to the global financial system.

In light of the potential risks posed by the Lyca Group's alleged involvement in money laundering, it is crucial for governments and regulatory authorities to scrutinize the company's business practices and take appropriate action to ensure the safety and stability of the nation. By prioritizing the security and stability of the nation above financial benefits, governments can better protect their citizens and critical national infrastructure from the potential dangers associated with money laundering and other illicit activities.

Ultimately, it is important to prioritize National Security and ensure that companies with questionable histories are not given undue influence over critical infrastructure.

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The Gazette of the Democratic Socialist Republic of Sri Lanka

අංක 1232/14 – 2002 අපේල් 19 වැනි සිකුරාදා – 2002.04.19 No. 1232/14 – FRIDAY, APRIL 19, 2002

(Published by Authority)

PART I: SECTION (I) — GENERAL

Government Notifications

NOTICE UNDER THE EXCHANGE CONTROL ACT, (CHAPTER 423 OF THE CLE)

Permission in terms of Sections 7, 10, 11, 15 and 30 (5) of the Exchange Control Act, (Chapter 423 of the CLF)

- 1. PERMISSION is hereby granted for the purposes of Section 10, 11, 15 and sub-section 5 of Section 30 as applicable of the Exchange Control Act (Chapter 432 of the CLE), for the issue and transfer of shares in a company upto 100% of the issued capital of such company, to approved country funds, approved regional funds, corporate bodies incorporated outside Sri Lanka and individuals resident outside Sri Lanka (inclusive of Sri Lankans resident outside Sri Lanka) subject to the exclusions, limitations and conditions hereinafter set out.
- 2. Exclusions.—The permission hereby granted shall not apply in respect of shares of a company proposing to carry on or carrying on any of the following businesses:
 - (i) Money lending,
 - (ii) Pawn broking,
 - (iii) Retail trade with a capital of less than One Million US Dollars,
 - (iv) Providing personal services other than for the export or tourism sectors,
 - (v) Coastal fishing.
- 3 Limitations.—(a) The permission hereby granted shall apply in respect of shares in a company carrying on or proposing to carry on any of the following businesses only upto 40% of the issued capital of such company, or if approval has been granted by the Board of Investment of Sri Lanka for a higher percentage of foreign investment in any company, only upto such higher percentage.
 - (1) Production of goods where Sri Lanka's exports are subject to internationally determined quota restrictions;
 - (ii) Growing and primary processing of tea, rubber, coconut, cocoa, rice, sugar and spices;
 - (iii) Mining and primary processing of non renewable national resources;
 - (iv) Timber based industries using local timber;
 - (v) Fishing (deep sea fishing);
 - (vi) Mass communications;
 - (vii) Education;
 - (viii) Freight forwarding;
 - (ix) Travel agencies;
 - (x) Shipping agencies.

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- (b) The permission hereby granted shall apply in respect of the shares of a company carrying on or proposing to carry on any of the businesses set out below only upto the percentage of the issued capital of the company for which percentage either general or special approval has been granted by the Government of Sri Lanka or any legal or administrative authority set up for the approval of foreign investment in such businesses.
 - (i) Air transportation;
 - (ii) Coastal shipping;
 - (iii) Industrial undertaking in the Second Schedule of the Industrial Promotion Act, No. 46 of 1990, namely any industry manufacturing arms, ammunitions, explosives, military vehicles and equipment aircraft and other military hardware;
 - any industry manufacturing poisons, narcotics, alcohols, dangerous drugs and toxic, hazardous or carcinogenic materials;
 - any industry producing currency, coins or security documents;
 - (iv) Large scale mechanized mining of gems;
 - (v) Lotteries.
- 4. Conditions.—(a) A person resident outside Sri Lanka who is a party to a transaction permitted hereunder shall make a declaration to the effect that such person is resident outside Sri Lanka on the share transfer form or share application form as applicable.
- (b) The payment for shares in any issue or transaction permitted hereunder shall be made only out of or into a Share Investment External Rupee Account opened in a commercial bank of Sri Lanka in accordance with directions given by the Controller of Exchange in that behalf to commercial banks.
- (c) A commercial bank, a licensed share broker or any other person entrusted with the payment of capital monies such as sale proceeds of shares, dividends and commissions in respect of any transaction permitted hereunder shall make such payment only into or out of a Share Investment External Rupee account referred to in sub-paragraph (b) above.
- (d) The Secretary/Registrar to a company in which the issue or transfer of shares to persons resident outside Sri Lanka are limited under paragraph 3 shall not register the name of any person resident outside Sri Lanka or a citizen of a foreign State or their nominee as a share holder in such company if by such registration the limits specified in paragraph 3 shall be exceeded.
 - 5. Permission is also hereby granted-
 - (a) under Section 11 of the Exchange Control Act for the transfer by approved country funds, approved regional funds, corporate bodies incorporated outside Sri Lanka and individuals resident outside Sri Lanka (inclusive of Sri Lankans resident outside Sri Lanka) of shares acquired in terms of paragraph 1 subject to the conditions stipulated in paragraphs 4 (a), 4 (b) and 4 (c);
 - (b) under Section 7 of the Exchange Control Act for making any payment to or for the credit of a person resident outside Sri Lanka in respect of a transaction permitted hereunder in accordance with the provisions of paragraph 4 (c).
 - 6. General.—Nothing contained in this Order shall be construed as affecting or having a bearing on—
 - (a) enterprises as defined in the Board of Investment of Sri Lanka Law, No. 4 of 1978 in respect of which exemptions have been granted from the Exchange Control Act, to the extent of such exemption;
 - (b) the provisions of any other written law.

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- 7. Interpretation.—For purposes of this Order—

 - (i) "issued capital" shall have the same meaning as in the Companies Act, No. 17 of 1982;
 (ii) "persons resident outside Sri Lanka" shall have the same meaning as in Order published under the Exchange Control Act in *Gazette* No. 15007 dated 21.04.1972.
- 8. The notices published in Gazette Extraordinary No. 721/4 of 29.06.1992 and Gazette No. 1122/12 of 07.03.2900 granting permission for purposes of Sections 7, 10, 11, 15 and sub-section 5 of Section 30 of the Exchange Control Act are hereby rescinded.

H. A. G. HETTIARACHCHI, Controller of Exchange.

Colombo, 19th April, 2002.

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ආරක්ෂක අමාත සාංශය பாதுகாப்பு அமைச்சு MINISTRY OF DEFENCE

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යොමුව:

- MFMM/06/02/VIS හා 2019 නොවැම්බර් 25 වන දිනැති ජනමාධෘ අමාතභාංශ ලිපිය.
- MOD/TEC/01/MGMR Network /2019(04) හා 2019 නොවැම්බර් මස 08 වන දිනැති ආරයපක ď). අමාතහාංශ ලිපිය.
- TRC/SM/BT/0031/08/UHF/19-009 හා 2019 නොවැම්බර් මස 15 වන දිනැති ශුී ලංකා විදුලි සංදේශ නියාමන කොම්පන් සභා ලිපිය.
- MOD/TEC/01/VIS Broadcasting /2019(04) හා 2019 නොවැම්බර් මස 28 වන දිනැති ආරසපක අමාතහාංශ ලිපිය.
- මෙම අමාතෲංශය මගින් VIS Broadcasting (Pvt) Ltd ආයතනය වෙත ගුවන් විදුලි විකාශන ආයතනයක් පවත්වාගෙන යාම සදහා මාධා බලපතුයක් ලබා දී ඇති අතර එම ආයතනයේ අධානප මණ්ඩලය වෙනස් කිරීම සදහා අනුමැතිය ලබාදෙන ලෙස යොමුව 'අ' දරණ ලිපියෙන් ඉල්ලීකේ කර
- එහෙත් VIS Broadcasting (Pvt) Ltd ආයතනය විසින් අධානය මණ්ඩලය වෙනස් කර දෙන ලෙස ඉල්ලීකේ කර ඇති ලිපියෙහි සදහන් අධායප ණේඩලයට ඇතුළත් තුරෙයි අප්පා ජෙයසිලන් ගෝවින්දසාම්, නිරුතන් රාජසුන්දරම්, ජෙගතීපන් ඉන්දුපුකාශ් යන තිදෙනා මීට පෙර ශුී ලංකා විදුලි සංදේශ නියාමන කොම්පන් සභාවෙන් අනුමැතිය ඉල්ලා ඇති MGMR Network යන ආයතනයේද අධෳඥාක වරුන් ලෙස පත්කර ඇති බව සදහන් කරඇති අතර ඔවන්ගෙන් තුරෙයි අප්පා ජෙයසීලන් ගෝවින්දසාමි, නිරුතන් රාජසුන්දරම් යන දෙදෙනාගේ පුද්ගලික තොරතුරු රාජෳ බුද්ධි සේවාව මෙගින් පරිසපා කිරීමේදී ආරක්පක නිශ්කාශන නිකුත් කිරීමට නොහැකි බව යොමුව 'ආ' දරණ ලිපිය මගින් විදුලි සංදේශ නියාමන කොමිපන් සභාව වෙත දන්වා ඇත.
- ඒ අනුව යොමුව 'ඇ' දරණ ශුී ලංකා විදුලි සංදේශ නියාමන කොම්පන් සභා ලිපිය ගෙින් VIS Broadcasting (Pvt) Ltd ආයතනය TV transmitter සදහා අනුදැතිය මෛ අමාතභාංශය වෙනින් ලබාදී ඇති අතර ඉහත දෙක පේදයෙහි සදහන් අධායපක වරුන් දෙදෙනාගේ තොරතුරු හේතුවෙන් VIS Broadcasting (Pvt) Ltd ආයතනය සදහා අධානය මණ්ඩලය වෙනස් කිරීමට හැකියාවක් නොමැති බව කාරුණිකව දන්වා සිටීම්.

අතිරේක ලේකම් (සිව්ල් ආරක්ෂක හා සංවර්ධන) ගෙනනුය Gerusorent (ජාතින பැනුපොරාදාර පැවිණලයුණුයෑව) Additional Secretary (Civil Defence and Development)

දුර./මුළැ./Tel. - 011 2335792 ෆැන්ස්./මුය./Fax. - 011 2335797

දුර./Qga./Tel. -011 2333930 ගැන්ස්./Qu./Fax.-011 24379:

අතිරේක දේශම් (පාර්ළිමේන්තු කටයුතු, පුතිපත්ති හා සැ

දුර./ Qga. / Tel. - 011 2389023 ගැන්ස් / Gg. / Fax. - 011 2389022 Additional Secretary / T හෙ ම ලබ

අධ්යක්ෂ ජනරාල් (නිණුම් හා මූලය) ದ್ದರೆ./Qgr./Tel. - 011 2439381 ರಾವಣೆ./Qu./Fax. - 011 2390720 கிப்பானர் நாயகம் (கணக்கு, நிதி) ector General (Accounts & Finance

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ස්තුතියි මෙයට විශ්වාසී

ඉංපි: ඩබ්.ආථ.එන්.ආථ.ජුම්වන්දු ආරක්පක ලේකම් (තාක්පණ) වැ.බ. ආරක්පක අමාතහාංශයේ ලේකම් වෙනුවට

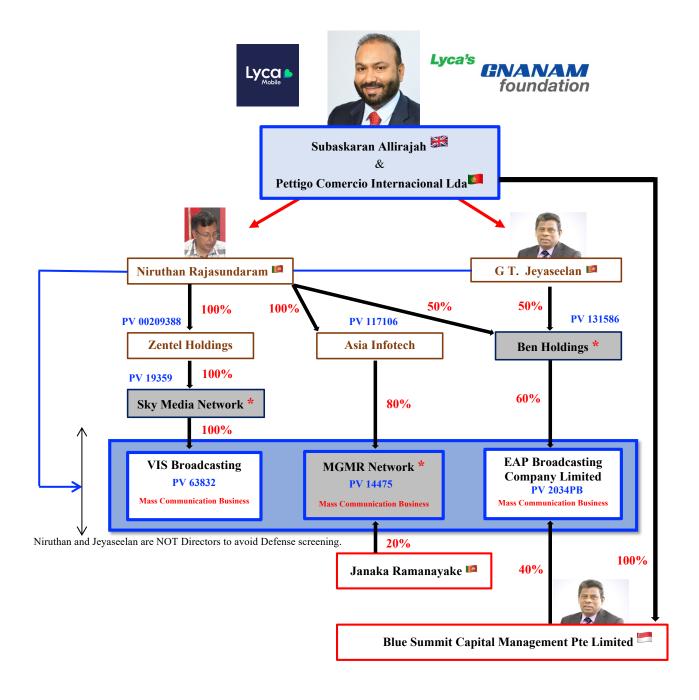
පිටපත්:

ශී ලංකා විදුලි සංදේශ නියානෙ කොම්පන් සභාව :- ඉහත ගැටළුව නිරාකරණය වන තෙක් VIS

Broadcasting (Pvt) Ltd ආයතනය සදහා
ආරක්පක නිශ්කාශන ලබානොදෙන බැවින් ඉහත යොමුව ඇ ලිපිය මගින් ලබා දි ඇති අනුලේනිය නාවකාලිකව අත්හිටුවන බව මින් දැනුම දෙනු ලබන අතර ඒ අනුව කටයුතු කරන මෙන් කාරුණිකව ඉල්ලා සිටීම්.

ශී ලංකා රේගු දෙපාර්තමේන්තුව පාලක, ආනයන හා අපනයන පාලන දෙපාර්තමේන්තුව VIS Broadcasting (Pvt) Ltd

Schedule D



Companies where Share Transfers have taken place to give ownership to **Niruthan**

Rajasundaram and G.T. Jeyaseelan *

- Ben Holdings (Private) Limited
- MGMR Network (Private) Limited
- Sky Media Network (Private) Limited

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ED searches offices of 'Ponniyin Selvan' makers in Chennai: Reports

By Aniruddha Dhar

May 16, 2023 01:23 PM IST













ED searches offices of 'Ponnivin Selvan' makers in Chennai: Reports I Latest News India - Hindustan Times

ED searches offices of 'Ponniyin Selvan' makers in Chennai: Reports

ED searches were underway at around eight premises in Chennai after the agency reportedly registered a money laundering case against the production house.

Aniruddha Dhar Follow

Enforcement Directorate (ED) officials on Tuesday conducted searches on the premises of film production company Lyca in Chennai, reports claimed. Searches were being held in different locations in the city, news agency PTI reported citing sources, who did not divulge details.



ED officials at LYCA Production office in Chennai.(ANI)





There was no immediate response from the production company regarding the raids, PTI added.

production house, NDTV reported.

Lyca produced the box-office hit movies Ponniyin Selvan 1 and 2. Searches were underway at around eight premises in Chennai after the central probe agency registered a money laundering case against the

Lyca Productions was established by Subaskaran Allirajah in 2014. A subgroup of Lycamobile, the production studio has been involved in the production and distribution of films made in South India.

Earlier ED said it had carried out search operations at 21 locations in Delhi and Gurugram in connection with Amira Pure Foods Private Limited, Karan A Chanana and others under the provisions of the Prevention of Money Laundering Act, 2002 (PMLA).

The searches were conducted by the ED on May 2 in which, cash amounting to ₹1.01 crore and various incriminating pieces of evidence were seized which shows the modus operandi of the accused entity for diverting the loan funds through shell companies, accommodation entries, fudging and manipulation of stocks, mentions the official statement.

According to the ED, the action against the accused entities came on the basis of an FIR registered by CBI against Karan A Chanana, his relatives, Amira Pure Foods Pvt. Ltd. and others under various sections of IPC, 1860 for committing fraud, criminal misappropriation, criminal breach of trust, cheating, etc. causing wrongful loss to the tune of approx--Rs. 1201.85 crore to the consortium of banks led by Canara Bank.

(With inputs from agencies)

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Business News > Lyca Productions Private Limited

LYCA PRODUCTIONS PRIVATE LIMITED

Lyca Productions Private Limited is a Non-govt company, incorporated on 16 Mar, 2007. It's a private unlisted company and is classified as'company limited by shares'.

Company's authorized capital stands at Rs 20000.0 lakhs and has 98.23377% paid-up capital which is Rs 19646.75 lakhs. Lyca Productions Private Limited last annual general meet (AGM) happened on 25 Aug, 2017. The company last updated its financials on 31 Mar, 2017 as per Ministry of Corporate Affairs (MCA).

Lyca Productions Private Limited is majorly in null business from last 16 years and currently, company operations are active. Current board members & directors are NEELAKANT NARAYANPUR, PREMANANTHAN AIADURAISIVASAMY and NIRUTHAN RAJASUNDARAM.

Lyca Productions Private Limited registered address is No: 55, Vijayaraghava Road, T. Nagar Chennai Chennai TN 600017 IN.

Lyca Productions Private Limited Details

CIN	U92120TN2007PTC062756
Date of Incorporation	16 Mar, 2007
Status	Active
Company Category	Company limited by Shares
Company Sub-category	Non-govt company
Company Class	Private
Authorized Capital	20000.0 lakhs
Paid-up Capital	19646.75 lakhs
Paid-up Capital %	98.23377
Registrar Office City	Chennai
Registration Number	62756
Listing Status	Unlisted
AGM last held on	25 Aug, 2017
Balance Sheet last updated on	31 Mar, 2017

Lyca Productions Private Limited **Directors**

NEELAKANT NARAYANPUR

PREMANANTHAN AIADURAISIVASAMY



NIRUTHAN RAJASUNDARAM



Lyca Productions Private Limited **Contact Details**

Address: No: 55, Vijayaraghava Road, T.

Nagar Chennai Chennai TN 600017

https://economic times.indiatimes.com/company/lyca-productions-private-limited/U92120TN2007PTC062756

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LYCAMOBILE UK LIMITED

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

21. Share capital

	2021 £	2020 £
Allotted, called up and fully paid		
200 (2020 - 200) Ordinary shares of £1.00 each	200	200

22. Pension commitments

The Company makes contributions to defined contribution pension schemes. The assets of the schemes are held separately from those of the Company in independently administered funds. The pension cost charge represents contributions payable by the Company to the funds and amounted to £189,000 (31 December 2020: £94,000). Contributions amounting to £31,000 (31 December 2020: £22,000) were payable at the reporting date.

23. Operating lease income receivable

The future minimum lease income receivable under non-cancellable operating leases are as follows:

	2021 £000	2020 £000
Not later than 1 year	-	23
	-	23

During the year £Nil (year ended 31 December 2020: £90,000) was recognised as income in profit or loss in respect of operating lease rentals.

24. Related party transactions

The Company's individual shareholders have similar interests in a range of related companies. As these companies are under common control, transactions between Lycamobile UK Ltd and these companies are related party transactions. These are set out below:

Lycatel Ireland Limited, Lycatel Services Limited, Switchware Limited, Lycatel GMBH, Lyca Media II Limited and Lycatelcom Lda are wholly owned subsidiaries of WWW Holding Company Limited in which Mr A Subaskaran owns 98.4% of the issued share capital. Lycamobile SRL is wholly own subsidiary of Lycatelcom Lda.

Mrs P Subaskaran is an ultimate beneficiary of Samra Trust incorporated in Jersey which owns Salinasco Holdings Limited incorporated in Cyprus. Salinasco Holdings Limited owns 98% issued share capital of Lycamobile USA Inc, Lycamobile Switzerland Limited, Lycamobile Belgium Limited, Lycamobile Norway Limited, Lycamobile Norway Nuf, Lycamobile Denmark Limited, Lycamobile Ireland Ltd, Lycamobile Denmark Aps, Lycamobile SP Zoo, Lycamobile SRL (Romania), Lycamobile Hong Kong Ltd (under administration), Ly, Lycamobile Limited which in turn owns Lycamobile Sweden Limited (UK). Lycamobile Sweden AB is wholly owned subsidiary of Lycamobile Sweden (UK) Limited.

Mr A Subaskaran owns 98.5% of the issued share capital of Lycatel Distribution UK Limited, Lycamoney Limited, Docklands Data Centre Ltd, Lyca Health Limited and Thames Quay Properties Holdings Limited, which in turn owns 100% of the share capital of Thames Quay Properties II Ltd and Thames Quay Properties III Ltd. Mr A Subaskaran also owns 97.5% of the issued share capital of Lycamobile Distribution Limited.

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LYCAMOBILE UK LIMITED

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

24. Related party transactions (continued)

Mr A Subaskaran owns 98% of the issued share capital of Lycamobile SARL, Lyca Media Limited, Lycamobile Europe Limited, Lycamobile Distribution Austria Ltd, Lycamobile Portugal Lda, Lycamobile Pty Limited and LM Holdco Limited. Lycamobile DOOEL Skopje (Lycamobile Macedonia), Lycamobile LLC Skopje, Lycamobile South Africa Pty Ltd, Lycamobile India Private Limited and Tunisa Services SARL are wholly owned subsidiaries of LM Holdco Limited in which Mr A Subaskaran owns 98% of the issued share capital.

Mr A Subaskaran is ultimate beneficiary of Albena and Ceuta Trust incorporated in Cyprus which owns Agadirco Holdings Limited (incorporated in Cyprus) and Catalinaco Holdings Limited (incorporated in Cyprus). Agadirco Holdings Limited owns 49.25% issued share capital of Pettigo Comércio Internacional Lda (a company registered in Portugal- formerly known as Hastings Trading E Serviços Lda) and Catalinaco Holdings Limited owns 49.25% issued share capital of Pettigo Comércio Internacional Lda.

Pettigo Comércio Internacional Lda.owns 100% of issued share capital of U can Fly Limited, LBOS Morocco Sarl au, Lycamobile SL (Disposed to third party during the prior year), Lycamobile SPRL and Onestopsim Lda. Pettigo Comércio Internacional, Lda also owns 63.05% of the issued share capital of Lycatel BPO Pvt Ltd (a company registered in India) and 63.05% of the issued share capital of Lyca Digital Pvt Ltd (a company registered in India).

Also, Pettigo Comércio Internacional, Lda owns 100% issued share capital of Proton Global Investments Limited (a company registered in Dubai) which holds 60% of ordinary share capital of Plintron Holding Pte Limited (a company registered in Singapore) which in turns wns Plintron Mobility Solutions Pvt Ltd (a company registered in India, formerly known as Plintron Global Technologies Pvt Ltd) and Plintron Europe Limited. Mr M Sundaram and Ms S Radhakrishnan equally owns 40% of ordinary share capital of Plintron Holdings Pte Limited and 100% of ordinary share capital of Plintron Management & Technology Services FZCO.

Mr M Sundaram owns 51% of Lyca Telecom Pvt Ltd (a company registered in India). Gnanam Properties Limited is owned by Mr and Mrs Subaskaran. Two Directors of Switchware Limited and Lycatel Property Services Limited jointly own Anglo-Indian Beverages Limited.

Mr A Subaskaran also owns 61% of the issued share capital of Lycatech Services Pvt Limited (Formerly known as Plintron Technologies Pvt Limited, a company registered in India).

Mr A Subaskaran also has an interest in,Lareka Investments Limited, Universal Marketing Services SUARL, Nexus Cab Company Limited and Gnanam Foundation (of which Mr A Subaskaran is on the board of trustees). During the year, the Company made a donation of £266,560 (2020: 442,000) to Gnanam Foundation.

Mr A Subaskaran also owns 61% of the issued share capital of Lycatech Services Pvt Limited (Formerly known as Plintron Technologies Pvt Limited, a company registered in India).

Mr A Subaskaran owns 100% of the issued share capital of Lyca Group Holdings which in turn owns 100% of the issued shares of Lyca Finance Limited and Lycamobile Holdings Limited.

The Director of Lycatel Property Services Limited Owned Excellent Entertainment Limited during the prior year.

During the period the Company purchased airtime from Lycatelcom Lda for its termination of international minutes. In addition, management fees were received for its administrative support and IT support service fees were charged for its office networking by Lycatelcom Lda. Outsourced support service fees were charged by Lycatel BPO Pvt Ltd for its back-office function. Network operational support service fees were charged by Plintron Mobility Solutions Pvt Ltd and Plintron Management & Technology Services FZCO for managing its telecom switches and network. Switching maintenance support service fees were charged by Lycatech Services Pvt Ltd, marketing support service fees were charged by Lycatel Distribution UK Limited for its outdoor branding of products, Digital marketing fees were charged by Lyca

Page 3

LYCAMOBILE UK LIMITED

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

24. Related party transactions (continued)

Digital Pvt, marketing fees were charged by Lycamedia II Ltd and Lyca Media Limited, space rental was charged by Docklands Data Centre Ltd for its telecom equipment location, travel management fees were charged by U Can Fly Ltd for its business related travel by employees, rent was charged by Gnanam Properties Limited, printing & marketing materials were provided by Lycatel Services Limited and annual rent was charged by Thames Quay Properties II Ltd for its office space.

The Company also purchased airtime from Tunisia Services SARL and during the prior year advertisement fees were charged by Excellent Entertainment Limited.

During the period the Company made administrative and telecom equipment & network provider support services and termination of airtime to Lycatelcom Lda , Administrative support to Pettigo Comércio Internacional, Lda and WWW Holding Company Limited. The company also recharged specific expenses to Lycatel services Limited.

During the year, the Company made a donation to Gnanam Foundation and sale of sim cards to Onestopsim LDA.

The Company granted loans to Mr. A Subaskaran and to parties associated to Mr. A Subaskaran. The terms of the loans and the balances are disclosed in note 14.

During the period the Company outsourced all of the administrative and support services to Lycatelcom Lda, a company with common directors and shareholders.

During the year the Company exchanged funds with various entities, which are summarised below. Lycamobile UK Limited ("LM UK" or "the Company") is part of the Company controlled by Mr A Subaskaran. Mr A Subaskaran owns 98% of LM UK's share capital and controls numerous other entities with which LM UK trades, buys services or exchanges funds ("the Company"). As a part of its year-end procedures, the Company performed an assessment of the recoverability of the amounts due from its Company companies. An intercompany and related party receivable is assessed at the reporting date to determine whether there is objective evidence that it is impaired. Intercompany and related party receivable assets are impaired if there is objective evidence indicates that a loss event has occurred after the initial recognition of the assets.

The company along with other related parties provided a comfort letter to the bank as security for supporting the operations of other related parties. No claims have been raised against such comfort letter. Post year end, the company has revoked the comfort letter.

Acesso à Certidão Permanente



Schedule H

Certidão Permanente de Registos



Permanent Certificate

Permanent Certificate Access Code: 5846-5375-5507

The delivery of this access code to any public or private entity doesn't require the presentation of the certificate in paper version (article 75, n° 5 of Código do Registo Comercial (Commercial Registry Code))

Registration

NIPC (Collective person/Registration identification number): 511249977 Company name: PETTIGÓ COMERCIO INTERNACIONAL , LDA (ZÓNA FRANCA DA MADEIRA)
Legal status: PRIVATE LIMITED COMPANY

Registered head office: Rua das Hortas n.º 1, Edifício do Carmo - 5.º, sala 500 District: Madeira (Funchal) Municipality: Funchal Parish: Funchal (Santa Luzia) 9050 024 FUNCHÀL

Object: Provision of economic consultancy services, in the creation and development of international companies, investments, marketing and advertising; import and export trade; purchase of immovable property for resale; purchase, exploitation and transfer of patents, trademarks and copyrights; management of own securities portfolio; purchase transfer and temporary or permanent exploitation, by any means of intellectual or industrial property rights including technical assistance services; commissions and consignments; undertaking of all acts necessary to increase business **Capital:** 20.000,00 EUR

Main CAE (Statistical Classification of Economic Activities): 70220-R3

Date of closure of financial year: 31 December

Signature: Signature of a manager. With plural management and one or more managers not residing in Portuguese Territory, the managers residing in the Island of Madeira (Continues -

Corporate Bodies/Liquidator/Judicial manager or administrator:

MANAGEMENT:

Name: RICHARD JOHN BENN

NIF/NIPC (taxpayer/collective person identification number): 223677078

Position: Manager

Name: FILOMENA DE FREITAS RODRIGUES BENN

NIF/NIPC (taxpayer/collective person identification number): 220143307

Position: Manager

Register office where documents are deposited: Conservatória do Registo Comercial da Zona Franca da Madeira

Corresponds to the previous registration number 7505/20050110 in Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira

The elements of this registration do not dispense with the consultation of the records and their endorsements and annotations inasmuch as they define the legal position of the entity.

Presentation 6/20050110 - FORMATION OF A COMPANY AND APPOINTMENT OF MEMBER(S) OF CORPORATE BODY(IES)

COMPANY NAME: HASTINGS - TRADING E SERVICOS LDA (ZONA FRANCA DA MADEIRA) NIPC (Collective person/Registration identification number): 511249977 LEGAL STATUS: PRIVATE LIMITED COMPANY REGISTERED HEAD OFFICE: Rua Trinta e Um de Janeiro, 81-A, 3.º-E

District: Madeira (Funchal) Municipality: Funchal Parish: Funchal (Santa Luzia) 9000 FUNCHAL

OBJECT: Provision of accounting, economic, computer, civil engineering and architectural services; construction, promotion and trade of real estate, tourist and hotel enterprises; services; construction, promotion and trade of real estate, tourist and hotel enterprises; consultancy in the referred areas and in the creation and development of international companies; import and export, retail or wholetrade, of foodstuff, electrical and electronic goods, office equipment, decoration, unworded or worked textiles; commissions and consignments; market assessment, promotion and marketing services; purchase, exploitation and transfer of patents, trademarks and copyrights; purchase of immovable property for resale; management of own securities portfolio. CAPITAL: 5.000,00 EUR

PARTNERS AND QUOTA:

QUOTA: 2.500,00 EUR

HOLDER: LEGACY INVESTMENTS LIMITED Registered head office: Guernsey

QUOTA: 2.500,00 EUR

HOLDER: THORN INVESTMENTS LIMITED Registered head office: Guernsey

SIGNATURE/CORPORATE BODIES:

Signature: Signature of a manager. With plural management and one or more managers not residing in Portuguese Territory, the managers residing in the Island of Madeira will not have powers to, individually or together, even with a manager, non-resident in the Island of Madeira, bind the company, to assume any bonds and or responsibilities, despite by omission.

Structure of management: Carried out by one manager or more.

REGISTER OF HEAD OFFICE:

District: Madeira (Funchal)

Municipality: Funchal Register Office: CRCom Zona Franca da Madeira

APPOINTED BODY(IES):

MANAGEMENT:

Richard John Benn

Residence/Registered head office: Rua do Ribeiro da Nora, 29, Santa Maria Maior,

Filomena de Freitas Rodrigues Benn

Residence/Registered head office: Rua do Ribeiro da Nora, 29, Santa Maria Maior,

Condensed extract of records 1 to 3. Published in JORAM on 2005-03-07.

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

End.1 PRESENTATION 12/20180628 10:05: 15 UTC - PENDING ON ADMINISTRATIVE VOLUNTARY LIQUIDATION

Ex officio Administrative Procedure initiated under subparagraph a) of article 5th of the RJPADLEC.

Register office: Comercial e Cartório Notarial Privativos da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Rec.2 PRESENTATION 4/20070419 10:36: 21 UTC - SHARE CAPITAL INCREASE

Amount of increase: 15000.00 EUR

Arrangement and form of subscription: in cash and subscribed by both partners in the

exact proportion to the quotas Capital after increase: 20000.00 EUR

PARTNERS AND QUOTA:

QUOTA: 10.000,00 EUR

HOLDER: THORN INVESTMENTS LIMITED

NIPC (Collective person/Registration identification number): 980293367 Registered head office: Anson Court, La Route des Camps, St. Martin, Guernesey GY1 3

QUOTA: 10.000,00 EUR

HOLDER: LEGACY INVESTMENTS LIMITED NIPC (Collective person/Registration identification number): 980293375 Registered head office: Anson Court, La Route des Camps, St. Martin, Guernesey GY1

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

An.1 20070515 - Published in JORAM of 2007-05-14

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Maria Neves Xavier Garcês

PRESENTATION 5/20070419 10:36: 22 UTC - Provisional due to legal formalities granted by statutory law - AMENDMENTS TO THE COMPANY'S INCORPORATION DEED

Article 64°, number 1, subparagraph j)

PARTNERS AND QUOTA:

QUOTA: 18.100,00 EUR

HOLDER: PREMATHARSHINI SARAVANTHASIVAM NIF (TAXPAYER IDENTIFICATION NUMBER): 259655471

Marital status: Married

Name of spouse: Allirajah Subaskaran Matrimonial property regime: Full common property Residence: 16 Leicester Road E11 2DP, England

QUOTA: 1.600,00 EUR

HOLDER: MILIND KANGLE NIF (TAXPAYER IDENTIFICATION NUMBER): 259655007

Marital status: Married Name of spouse: Sharula Palava

Matrimonial property regime: Full common property Residence: Corner Cottage, 67 Norden Road, Maindenhead SL6 4AZ, England

OUOTA: 100,00 EUR

HOLDER: MOHAMMED MALIQUE

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655201

Marital status: Married

Name of spouse: Yasmin Rashid

Matrimonial property regime: Full common property Residence: 6 Eltham Green, London SE9 5JZ, England

QUOTA: 100,00 EUR

HOLDER: AIADURAI SIVASAMY PREMANANTHAN NIF (TAXPAYER IDENTIFICATION NUMBER): 259655384

Marital status: Married

Name of spouse: Sasireka Nadarajah

Matrimonial property regime: Full common property Residence: 37 Elms Lane, Wembley, Middlessex HAO 2NX, England

OUOTA: 100,00 EUR

HOLDER: CHRISTOPHER DONALD MICHAEL TOOLEY NIF (TAXPAYER IDENTIFICATION NUMBER): 259655333

Marital status: Married Name of spouse: Emma Brown

Matrimonial property regime: Full common property Residence: 6 The Dene Sevrnoaks, Kent TN13 1 Pb, England

Amended article(s): 4.0

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

An.1 20070611 - Published in JORAM of 2007-06-05.

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Ana Maria Ferreira Carvalho

End.1 PRESENTATION 6/20070528 12:25: 39 UTC - CONVERTED

The holder of the quota of 18.100,00 EUR PREMATHARSHINI SARAVANTHASIVAM has NIF (TAXPAYER IDENTIFICATION NUMBER) 259 655 473.

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

End.2 PRESENTATION 1/20101028 11:19: 30 UTC - UPDATE DE NOME OF THE **PARTNER**

PARTNERS AND QUOTA:

QUOTA: 18.100,00 EUR

HOLDER: PREMATHARSHINI SUBASKARAN

NIF/NIPC (taxpayer/collective person identification number): 259655473

Name of spouse: Allirajah Subaskaran Residence/Registered head office: 16 Leicester Road E11 2DP, England

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Annotation 1 - 20101028 - Published at

http://www.mj.gov.pt/publicacoes. Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

PRESENTATION 4/20111017 14:16: 12 UTC - CHANGE OF REGISTERED HEAD-Rec.4

REGISTERED HEAD OFFICE: Rua das Hortas n.º 1, Edifício do Carmo - 5.º, sala 500 District: Madeira (Funchal) Municipality: Funchal Parish: Funchal (Santa Luzia)

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Annotation 1 - 20111018 - Published at http://www.mj.gov.pt/publicacoes. Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Rec.5 PRESENTATION 7/20111207 16:20: 14 UTC - AMENDMENTS TO THE COMPANY'S INCORPORATION DEED (ONLINE)

Amended article(s): 7º (Transfer of guotas)

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Annotation 1 - 20111209 - Published at http://www.mj.gov.pt/publicacoes. Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Rec.6 PRESENTATION 4/20140924 15:21: 05 UTC - AMENDMENTS TO THE COMPANY'S INCORPORATION DEED (ONLINE)

Amended article(s): 1.º (Company name) and 2.º (Object)

COMPANY NAME: PETTIGO COMERCIO INTERNACIONAL, LDA (ZONA FRANCA DA

OBJECT: Provision of economic consultancy services, in the creation and development of international companies, investments, marketing and advertising; import and export trade; purchase of immovable property for resale; purchase, exploitation and transfer of patents, trademarks and copyrights; management of own securities portfolio; purchase transfer and temporary or permanent exploitation, by any means of intellectual or industrial property rights including technical assistance services; commissions and consignments; undertaking of all acts necessary to increase business.

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Annotation 1 - 20140924 - Published at http://www.mj.gov.pt/publicacoes. Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Conservador(a), Maria de Fátima Pereira dos Reis Coelho

Mention Deposit 1025/2007-04-19 10:47: 25 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

QUOTA: 10.000,00 EUR

HOLDER: PREMATHARSHINI SARAVANTHASIVAM NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473 Marital status: Married

Name of spouse: Alliraiah Subaskaran

Matrimonial property regime: Full common property

Residence: 16 Leicester Road, London

TRANSMITTING PARTY(IES):

THORN INVESTMENTS LIMITED

NIPC (Collective person/Registration identification number): 980293367 REGISTERED HEAD OFFICE: Anson Court, La Route des Camps, St. Martin, GY1 3UQ,

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1026/2007-04-19 10:47: 25 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

QUOTA: 8.100,00 EUR

Amount resulting from quota division: of 10.000,00 EUR in 5 quotas HOLDER: PREMATHARSHINI SARAVANTHASIVAM NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

TRANSMITTING PARTY(IES):

LEGACY INVESTMENTS LIMITED

NIPC (Collective person/Registration identification number): 980293375
REGISTERED HEAD OFFICE: Anson Court, La Route des Camps, St. Martin GY1 3UQ, Channel Islands

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1027/2007-04-19 10:47: 26 UTC - UNIFICATION OF QUOTAS

QUOTAS TO UNIFY:

QUOTA: 10.000,00 EUR

QUOTA: 8.100,00 EUR

UNIFIED QUOTA AND HOLDER(S):

OUOTA: 18.100.00 EUR

HOLDER: PREMATHARSHINI SARAVANTHASIVAM NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

Marital status: Married Name of spouse: Allirajah Subaskaran

Matrimonial property regime: Full common property Residence: 16 Leicester Road, London

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1028/2007-04-19 10:47: 26 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

QUOTA: 1.600,00 EUR

Amount resulting from quota division: of 10.000,00 EUR in 5 quotas HOLDER: MILIND KANGLE

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655007 Marital status: Married

Name of spouse: Sharula Palava

Matrimonial property regime: Full common property Residence: Corner Cottage, 67 Norden Road, Maidenhead, SL6 4AZ, England

TRANSMITTING PARTY(IES):

LEGACY INVESTMENTS LIMITED

NIPC (Collective person/Registration identification number): 980293375

REGISTERED HEAD OFFICE: Anson Court, La Route des Camps, St. Martin, GY1 3UQ,

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1029/2007-04-19 10:47: 26 UTC - TRANSFER OF QUOTA(S)

OUOTA(S) AND RECEIVING PARTY(IES):

OUOTA: 100,00 EUR

Amount resulting from quota division: of 10.000,00 EUR in 5 quotas HOLDER: MOHAMMED MALIQUE

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655201

Marital status: Married

Name of spouse: Yasmin Rashid Matrimonial property regime: Full common property

Residence: 6 Eltham Green, London

TRANSMITTING PARTY(IES):

LEGACY INVESTMENTS LIMITED

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1030/2007-04-19 10:47: 26 UTC - TRANSFER OF QUOTA(S)

OUOTA(S) AND RECEIVING PARTY(IES):

QUOTA: 100,00 EUR

Amount resulting from quota division: of 10.000,00 EUR in 5 quotas HOLDER: AIADURAI SIVASAMY PREMANANTHAN

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655384 Marital status: Married

Name of spouse: Sasireka Nadarajah

Matrimonial property regime: Full common property

Residence: 37 Elms Lane, Wembley, Middlessex, HAO 2NX, England

TRANSMITTING PARTY(IES):

LEGACY INVESTMENTS LIMITED

Applicant and responsible for the registry: Richard John Benn

Mention Deposit 1031/2007-04-19 10:47: 26 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

QUOTA: 100,00 EUR

Amount resulting from quota division: of 10.000,00 EUR in 5 quotas HOLDER: CRISTOPHER DONALD MICHAEL TOOLEY

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655333

Marital status: Married

Name of spouse: Emma Brown
Matrimonial property regime: Full common property
Residence: 6 The Dene, Sevenoaks, Kent, TN13 1PB, England

TRANSMITTING PARTY(IES):

LEGACY INVESTMENTS LIMITED

Applicant and responsible for the registry: Richard John Benn

Mention DEPOSIT 5179/2007-09-20 14:43: 24 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2006

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA

FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20070920 - Published at http://www.mi.gov.pt/publicacoes

Mention DEPOSIT 3658/2008-07-18 18:38: 59 UTC - SUBMISSION OF INDIVIDUAL **ACCOUNTS**

Year of submission of accounts: 2007

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January Annotation 1 - 20080718 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 3665/2009-08-05 18:12: 13 UTC - SUBMISSION OF INDIVIDUAL **ACCOUNTS**

Year of submission of accounts: 2008

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA

FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20090805 - Published at http://www.mj.gov.pt/publicacoes

Mention Deposit 664/2010-04-30 14:27: 19 UTC - SUBMISSION OF INDIVIDUAL

ACCOUNTS

Year of submission of accounts: 2004

Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n.º 202-M Address: Rua 31 de Janeiro, 81 3.º B

Post code: 9050-401 Funchal

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Ana Maria Ferreira Carvalho

Annotation 1 - 20100430 - Published at http://www.mj.gov.pt/publicacoes.

Mention Deposit 665/2010-04-30 14:27: 19 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2005

Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n.º 202-M Address: Rua 31 de Janeiro, 81 3.º B Post code: 9050-401 Funchal

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Ana Maria Ferreira Carvalho

Annotation 1 - 20100430 - Published at http://www.mj.gov.pt/publicacoes.

Mention DEPOSIT 2987/2010-07-16 20:34: 54 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009

Applicant and responsible for the registry: $HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA$

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20100716 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1104/2011-09-25 00:29: 52 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2008 (2008-01-01 to 2008-12-31)

Applicant and responsible for the registry: $HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA$

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20110925 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1105/2011-09-25 00:29: 54 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009 (2009-01-01 to 2009-12-31)

Applicant and responsible for the registry: ${\it HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA}$

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20110925 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 999/2012-05-01 20:05: 03 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2008 (2008-01-01 to 2008-12-31)

Applicant and responsible for the registry: $HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA$

Mention undertaken pursuant to Decree-Law no 8/2007 of 17 January

Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1000/2012-05-01 20:05: 04 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009 (2009-01-01 to 2009-12-31)

Applicant and responsible for the registry: $HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA$

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1001/2012-05-01 20:05: 04 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2010 (2010-01-01 to 2010-12-31)

Applicant and responsible for the registry: $HASTINGS\ TRADING\ E\ SERVIÇOS\ LDA\ ZONA\ FRANCA\ DA\ MADEIRA$

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 2544/2012-07-15 20:14: 34 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

ACCOUNTS

Year of submission of accounts: 2004

Applicant and responsible for the registry, Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n.º 202-M Address: Rua 31 de Janeiro, 81 3.º B

Post code: 9050-401 Funchal

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Ana Maria Ferreira Carvalho

Annotation 1 - 20100430 - Published at http://www.mj.gov.pt/publicacoes.

Mention Deposit 665/2010-04-30 14:27: 19 UTC - SUBMISSION OF INDIVIDUAL **ACCOUNTS**

Year of submission of accounts: 2005

Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n.º 202-M Address: Rua 31 de Janeiro, 81 3.º B Post code: 9050-401 Funchal

Register Office: Conservatória do Registo Comercial da Zona Franca da Madeira Register Officer: O(A) Escriturário(a) Superior, Ana Maria Ferreira Carvalho

Annotation 1 - 20100430 - Published at http://www.mj.gov.pt/publicacoes.

Mention DEPOSIT 2987/2010-07-16 20:34: 54 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20100716 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1104/2011-09-25 00:29: 52 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2008 (2008-01-01 to 2008-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law no 8/2007 of 17 January

Annotation 1 - 20110925 - Published at http://www.mi.gov.pt/publicacoes

Mention DEPOSIT 1105/2011-09-25 00:29: 54 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009 (2009-01-01 to 2009-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20110925 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 999/2012-05-01 20:05: 03 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2008 (2008-01-01 to 2008-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Mention DEPOSIT 1000/2012-05-01 20:05: 04 UTC - UPDATE - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2009 (2009-01-01 to 2009-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1001/2012-05-01 20:05: 04 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2010 (2010-01-01 to 2010-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January Annotation 1 - 20120501 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 2544/2012-07-15 20:14: 34 UTC - SUBMISSION OF INDIVIDUAL **ACCOUNTS**

Year of submission of accounts: 2011 (2011-01-01 to 2011-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA RANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20120715 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 2090/2013-07-16 18:45: 06 UTC - SUBMISSION OF INDIVIDUAL **ACCOUNTS**

Year of submission of accounts: 2012 (2012-01-01 to 2012-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20130716 - Published at http://www.mj.gov.pt/publicacoes

Mention DEPOSIT 1614/2014-07-16 23:08: 39 UTC - SUBMISSION OF INDIVIDUAL ACCOUNTS

Year of submission of accounts: 2013 (2013-01-01 to 2013-12-31)

Applicant and responsible for the registry: HASTINGS TRADING E SERVIÇOS LDA ZONA FRANCA DA MADEIRA

Mention undertaken pursuant to Decree-Law nº 8/2007 of 17 January

Annotation 1 - 20140716 - Published at http://www.mj.gov.pt/publicacoes

Mention Deposit 237/2015-03-31 17:25: 41 UTC - TRANSFER OF QUOTA(S)

QUOTA AND RECEIVING PARTY:

QUOTA: 1.600,00 EUR

HOLDER: Prematharshini Subaskaran

NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

Marital status: Married

Name of spouse: Allirajah Subaskaran

Matrimonial property regime: Full common property Residence: 69, Manor Road, Chigwell Essex IG7 5PH, Essex, United Kingdom

TRANSMITTING PARTY:

QUOTA: 1.600,00 EUR

Holder: Milind Purushottam Kangle NIF (TAXPAYER IDENTIFICATION NUMBER): 259655007

Marital status: Married Name of spouse: Sharula Milind Kangle

Matrimonial property regime: Full common property Residence: Leicester Road, London E11 2DP, London, United Kingdom

Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n° 202m Address: Rua 31 de Janeiro 81-A, 3° B, Funchal Post code: 9050-011 Funchal Mention undertaken by the presentor pursuant to article 55-A, n° 4 of Código do

registo comercial (commercial registry code)

Mention Deposit 238/2015-03-31 17:29: 14 UTC - UNIFICATION OF QUOTA(S)

OUOTAS TO UNIFY:

OUOTA: 18.100,00 EUR

QUOTA: 1.600,00 EUR

UNIFIED QUOTA AND HOLDER:

QUOTA: 19.700,00 EUR

Holder: Prematharshini Subaskaran NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

Marital status: Married

Name of spouse: Allirajah Subaskaran

Matrimonial property regime: Full common property Residence: 69, Manor Road, Chigwell Essex, IG7 5PH, Essex, United Kingdom

Applicant and responsible for the registry,

Ricardo Pereira, Lawyer, Professional licence nº 202m Address: Rua 31 de Janeiro 81-A, 3º B, Funchal Post code: 9050-011 Funchal Mention undertaken by the presentor pursuant to article 55-A, nº 4 of Código do registo comercial (commercial registry code)

Mention Deposit 367/2017-06-05 16:10: 23 UTC - TRANSFER OF QUOTA(S)

QUOTA AND RECEIVING PARTY:

OUOTA: 9.850.00 EUR

HOLDER: Farensia Holdings Limited NIPC (Collective person/Registration identification number): 980579953 Registered head office: Karaiskaki, 13, 3032, Limassol, Cyprus

TRANSMITTING PARTY:

QUOTA: 9.850,00 EUR

Holder: Prematharshini Subaskaran NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

Marital status: Married

Name of spouse: Allirajah Subaskaran Matrimonial property regime: Separation

Residence: 69 Manor Road, Chigwell, Essex IG7 5PH, Essex, United Kingdom

Applicant and responsible for the registry, Maria Forte Vaz, Lawyer, Professional licence no 17218l Address: Rua Nova da Trindade 1, 3 Dto Post code: 1200-301 Lisbon

Mention undertaken by the presentor pursuant to article 55-A, nº 4 of Código do

registo comercial (commercial registry code)

Mention Deposit 368/2017-06-05 16:13: 34 UTC - TRANSFER OF QUOTA(S)

OUOTA AND RECEIVING PARTY:

OUOTA: 9.850.00 FUR

HOLDER: Memoro Holdings Limited NIPC (Collective person/Registration identification number): 980579961 Registered head office: Karaiskaki, 13, 3032, Limassol, Cyprus

TRANSMITTING PARTY:

QUOTA: 9.850,00 EUR

Holder: Prematharshini Subaskaran NIF (TAXPAYER IDENTIFICATION NUMBER): 259655473

Marital status: Married

Name of spouse: Allirajah Subaskaran Matrimonial property regime: Separation Residence: 69 Manor Road, Chigwell, Essex IG7 5PH, Essex, United Kingdom

Applicant and responsible for the registry, Maria Forte Vaz, Lawyer, Professional licence nº 17218l Address: Rua Nova da Trindade 1, 3 Dto Post code: 1200-301 Lisbon

Mention undertaken by the presentor pursuant to article 55-A, nº 4 of Código do

registo comercial (commercial registry code)

Mention Deposit 1731/2018-08-17 11:44: 20 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

HOLDER: AGADIRCO HOLDINGS LIMITED NIF/NIPC (taxpayer/collective person identification number): 980579953 Residence/Registered head office: Karaiskaki, 13, 3032, Limassol

UPDATE of Deposit 367/2017-06-05, regarding the name of the partner previously called: "FARENSIA HOLDINGS LIMITED".

Applicant and responsible for the registry.

Ricardo Pereira, Lawyer, Professional licence n.º 202M Address: Rua 31 de Janeiro, nº 81-A, 3° B

Post code: 9050-011 Funchal

Mention Deposit 1732/2018-08-17 11:44: 35 UTC - TRANSFER OF QUOTA(S)

QUOTA(S) AND RECEIVING PARTY(IES):

HOLDER: CATALINACO HOLDINGS LIMITED NIF/NIPC (taxpayer/collective person identification number): 980579961

Residence/Registered head office: Karaiskaki, 13, 3032, Limassol

UPDATE of Deposit Deposit 368/2017-06-05, regarding the name of the partner previously called: "MEMORO HOLDINGS LIMITED"

Applicant and responsible for the registry, Ricardo Pereira, Lawyer, Professional licence n.º 202M Address: Rua 31 de Janeiro, nº 81-A, 3º B Post code: 9050-011 Funchal

Permanent certificate subscribed in 21-09-2018 and valid until 21-09-2019

End of Certificate

Important Note:No need for printing. Present the access code to any public or private entity whenever a commercial registry certificate is required.





Business Profile (BPFCOY)

BLUE SUMMIT CAPITAL MANAGEMENT PTE. LTD.

Particulars

Name : BLUE SUMMIT CAPITAL MANAGEMENT PTE. LTD.

Registration Number / UEN : 201801696R Incorporation / Registration Date : 12-01-2018

Name Effective Date : -

Country / Region of

Incorporation / Registration : SINGAPORE

Company Type : PRIVATE COMPANY LIMITED BY SHARES

Registered Address : 600 NORTH BRIDGE ROAD

#23-01 PARKVIEW SQUARE

SINGAPORE 188778

Address Effective Date : 01-09-2019

Status : LIVE COMPANY

Status Effective Date : 12-01-2018

Principal Activity Code (I) : 64202

Principal Activity Description (I) : OTHER HOLDING COMPANIES

Principal Activity Code (II) :
Principal Activity Description (II) : -

Amalgamation Details : -

Former Name(s)

NIL

 Date/Time Generated:
 15-06-2023 02:01:29AM
 Page 1 of 3

Capital

Туре	No. of Shares	Issued Amount	Paid-Up Amount	Currency
Ordinary	1,000,000	1,000,000.00	1,000,000.00	UNITED STATES OF AMERICA, DOLLARS
Preference	32,250,000	32,250,000.00	32,250,000.00	UNITED STATES OF AMERICA, DOLLARS

Auditor(s)

Name : PKF-CAP LLP

Date of Appointment : 13-02-2020

Charge(s)

NIL

Officer(s)

No.	Name	ID	Nationality	Position	Date of Appointment
1	CHRISTOPHER DONALD MICHAEL TOOLEY	525699311	BRITISH	DIRECTOR	19-10-2018

Address

2ND FLOOR, WALBROOK BUILDING, 195 MARSH WALL LONDON, E14 9SG, UNITED KINGDOM

No.	Name	ID	Nationality	Position	Date of Appointment
2	AIADURAI SIVASAMY PREMANANTHAN	536611711	BRITISH	DIRECTOR	19-10-2018

Address

2ND FLOOR, WALBROOK BUILDING, 195 MARSH WALL LONDON, E14 9SG, UNITED KINGDOM

No.	Name	ID	Nationality	Position	Date of Appointment
3	FIONA LIM PEI PEI	S7369291A	SINGAPORE CITIZEN	SECRETARY	23-03-2022

Address

600 NORTH BRIDGE ROAD #23-01 PARKVIEW SQUARE SINGAPORE 188778

No.	Name	ID	Nationality	Position	Date of Appointment
4	WOON WEE CHUN	S8039138B	SINGAPORE CITIZEN	DIRECTOR	30-04-2021

Address

84 YIO CHU KANG GARDENS SINGAPORE 568132

Shareholder(s)

Date/Time Generated: 15-06-2023 02:01:29AM

No.	Name	UEN	Country		Address	
1	PETTIGO COMERCIO INTERNACIONAL LDA	T18UF5176C	PORTUGAL		DAS HORTAS 1, EDIFICIO DO MO 5-500FUNCHAL 9050-024, MADEIRA	
	Share Category	Share Type	Share Allo	cation	Currency	
	UNREGISTERED FOREIGN ENTITY	ORDINARY SHARES	1,000,0	00	UNITED STATES OF AMERICA, DOLLARS	
No.	Name	UEN	Country		Address	
2	PETTIGO COMERCIO INTERNACIONAL LDA	T18UF5176C	PORTUGAL		DAS HORTAS 1, EDIFICIO DO MO 5-500FUNCHAL 9050-024, MADEIRA	
		~ ! -	Share Allocation		_	
	Share Category	Share Type	Snare Allo	cation	Currency	

Compliance Records

 Date of Last AGM
 : 14-07-2021

 Date of Last AR
 : 19-09-2021

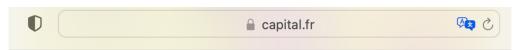
 Date of A/C Laid at Last AGM
 : 31-03-2019

Disclaimer

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Schedule J



Capital

Lycamobile in court, 17 million euros would have been laundered thanks to prepaid cards

homepage > Companies and markets

fraud FOLLOW THIS SUBJECT



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According to a report from the Bercy intelligence cell, the Paris court is considering from Monday, June 12, an alleged "structured organization", involving a series of front companies stamped Lycamobile. They allegedly embezzled 17 million euros by defrauding VAT between 2014 and 2016.

By Capital with AFP

Published on 12/06/2023 at 11:43 am



Listen to this article Lycamobile in court, 17 million euros would h 00:00

No, but hello what! The companies Lycamobile France and Lycamobile Services are implicated in a money laundering case via prepaid telephone cards. Three officials and eight other people are indeed tried in Paris from Monday, June 12, suspected of laundering and VAT fraud between 2014 and 2016. Until July 5, the 32nd correctional chamber of the capital court must look at an alleged "sustainable organization", involving a series of front companies and merchants in the Parisian district of La Chapelle, which would have made it possible to launder more than 17 million euros in seven months. A "system" set up "at the knowledge" of Lycamobile, according to the company, which defends itself from any infringement.



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- The French number 2 of jam admits to being at the "edge of the precipice"
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Source:



https://www.capital.fr

Revealed by the Buzzfeed website, the case started from a reportTracfin, Bercy's financial intelligence unit, which led to the opening of a preliminary investigation in early 2016, then appointed to an investigating judge. The investigations revealed a circular operation where construction companies were transformed, initially, which execute transfers and cheques to "filter" companies, in exchange for false invoices. These companies, actually empty shells, bought cards and telephone recharges from Lycamobile, but these goods were not received, according to the investigation.

Two Lycamobile salespeople sold them to shops in the 18th arrondissement of Paris, which gave them cash in return. It was this cash, reduced in commissions for intermediaries, that finally fell to the initial construction companies, who would have used it to illegally remunerate their employees or managers, according to the investigations. Prepaid cards and their recharges were income on the "ethnic market" of Maghreb, African and Indo-Pakistani communities wishing to call abroad.

"This procedure shows very clearly that +filters+ companies and construction companies have organized and set up a system to pay for work hidden by a set of SIM card resales without Lycamobile's knowledge," a company spokesman told AFP. "We cannot therefore hold Lycamobile responsible for the implementation of this illegal scheme, which is totally foreign to it," adds the spokesman.

"Pressure on turnover"

On the contrary, the accusation notes "the absence of any serious control over contracts, the pressure on turnover by London management and the very large volumes generated by these companies + filters + customers, in addition to a confused and fragmented management between France and the United Kingdom". In the year of its creation, a "filter" company made a "higher" volume of purchases than Relay stores, the accusation still notes. The examining court also has suspicions of VAT fraud by the "derogation" of a legal derogation regime existing in the telephony sector.

The prosecution considers that, via a "montage" between the two sister companies, Lycamobile Services unduly resold the telephone products, purchased all taxes included (including VAT) from Lycamobile France, at a price excluding tax (HT), which allows it to request VAT refunds. In this section, the companies and their leaders relentlessly affirmed during the investigation that they were in good faith and refute any fraud. Lycamobile France, Lycamobile Services, as well as Alain Jochimek, general manager managing the two companies, are tried for laundering abuse of social property and hidden work in an organized gang.

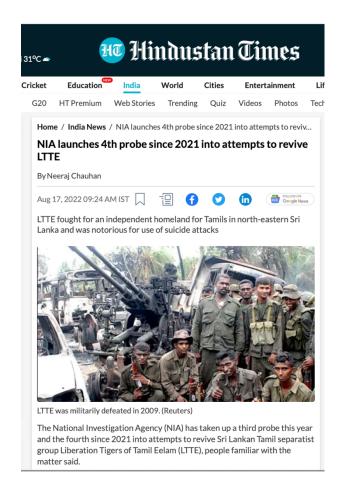
Lycamobile Services and Mr. Jochimek also appear for VAT fraud in an organized gang, Lycamobile France being continued for complicity in this second offence. Two English executives, Lycamobile services manager Andrew England and CEO Christopher Tooley, provided a non-suit in the laundry component. They appear respectively for VAT fraud in an organized gang and for complicity in this offence. Eight other defendants are tried for one or the other offence, suspected of having played a role in the system.

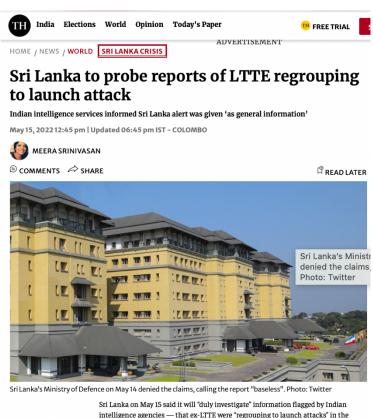
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The government wants to create an "anti-scrotch filter" online or by SMS

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LTTE Activations in Recent Times: 2021 – 2023





SUNDAY OBSERVER

in *The Hindu*.

Editorial



still alive, and would emerge in public soon.



island — and "strengthen security", a day after authorities denied the claim reported

nich works to revive the Liberation Tigers of Tamil Eelam (LTTE).

n, the India Abroad News Service (IANS) and other India media reported yesterday.

The suspect arrested following Thursday's searches was identified as Ayyappan Nandhu. He has been found to be managing the drug trade on behalf of Muhammed Asmin, a Sri Lankan refugee and a drug trafficker wit conspired with other accused to revive the LTTE through the drugs and arms trade.

The NIA also seized a huge cache of cash, gold bars, digital devices, drugs, and documents, along with other incriminating material during the raid. The agency launched investigations into the racket in July 2022. As of now, the NIA has made 14 arrests including the latest arrest, which was made on Thursday, In December last year, 13 people were arrested during raids in 21 locations across Tamil Nadu (TN).

Miscellaneous

capacity

Australian regulator fines Lycamobile for 'dangerous' failures

Alan Burkitt-Gray May 19, 2021 09:08 AM



The Australian telecoms regulator has fined the local branch of Lycamobile for what it calls "public safety failures".

The Australian Communications and Media Authority (ACMA) said it had found "prolonged and large-scale customer data failures, which could have put people in danger", and fined the UK-based company A\$600,000 (US\$464,000).

The regulator said: "Lycamobile did not provide accurate customer information to an industry database used by police, fire and ambulance services, and 4,207 instances where it failed to comply with ID check rules before signing up prepaid mobile customers".

Capacity has contacted Chris Tooley, the London-based CEO of Lycamobile, for a comment, as well as the company's public relations agency. The ACMA named Tooley in its direction under the Telecommunications Act 1997.

ACMA chair Nerida O'Loughlin (pictured) said the integrated public numbers database (IPND) is used by emergency services when responding to emergency calls from the public - 000 in Australia, the equivalent of 911 in North America, 112 in the EU and 999 in the UK.

Information from the IPND is also used for the emergency alert service, which was relied on extensively throughout the 2020 bushfires and Covid crises, said the ACMA.

"Telcos have a responsibility to help keep Australians safe during natural disasters or lifethreatening circumstances. Lycamobile may have put people's lives at risk by not passing accurate information on to the IPND," said O'Loughlin.

The ACMA said that Lycamobile's "failure to undertake proper customer ID checks when activating prepaid services is also a public safety issue, as police investigations into criminal activity are hampered when the owner of a mobile phone cannot be identified".

It said it "required the company to conduct an independent audit of its systems and processes and to implement improvements, given the serious nature of Lycamobile's non-compliance over a lengthy period".

Tooley became CEO of the Lycamobile group in 2014, according to his LinkedIn entry.

In 2016 the company denied wrongdoing after French authorities raided its Paris office, arrested 19 executives and charged nine of them. According to *BuzzFeed News*, the charges are linked to suspicions of money laundering and tax fraud.

Lycamobile denied "all allegations of wrongdoing", and said via its PR agency: "Lycamobile strongly denies all allegations of wrongdoing as reported by BuzzFeed media and subsequent news reports."

https://www.capacitymedia.com/article/29otd6mddjpstggqmvm68/news/australian-regulator-fines-lycamobile-for-dangerous-failures

Miscellaneous

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KPMG hangs up on telco operator Lycamobile

Pat Sweet, Reporter, Accountancy Daily [2010-2021]











KPMG has resigned as the auditor of Lycamobile UK Ltd, citing problems in obtaining 'sufficient, appropriate audit evidence' and concerns about whether there are adequate accounting records at the mobile network operator, which is involved in a £26m VAT dispute with HMRC

In a statement, KPMG said: 'We could not obtain sufficient, appropriate audit evidence at Lycamobile UK Ltd (and for related audits of its related UK companies) as a result of the governance structure and oversight of the companies' system of internal control over financial reporting.

'We have been auditor for three years and have worked tirelessly with the company over that time. But as with 2014 and 2015, again in 2016 we were not able to obtain all the information and explanations from the company that we considered necessary for the purpose of our audit. We were also unable to determine whether adequate accounting records have been kept by the

'Resigning an audit is not a step we take lightly. However we do not believe that it is appropriate to remain as auditor when underlying factors giving rise to qualifications to our audit opinion of this nature and significance remain outstanding over a period of time.'

A note to the annual report and consolidated financial statements for the year ended 29 February 2016 references an ongoing dispute with HMRC over 'certain VAT positions' taken by Lycamobile between 1 July 2012 and 29 February 2016. The original amount at stake was £19.3m including penalties, which has now increased to £25.9m.

In addition, there is another dispute over £669,999 of diverted profits tax, and the note also references ongoing discussions and enquiries between Lycamobile and HMRC over related party transactions between the company and certain related party companies.

The circumstances of KPMG's resignation have become a matter of dispute, with Lycamobile putting out a statement saying the company had 'given formal notification to terminate' KPMG's position last month, on 24 April and that therefore it was the company which had terminated the relationship with the auditor, rather than the auditor resigning as KPMG stated.

Responding to this claim, KPMG said in a further statement: 'KPMG advised Lycamobile in November 2016 that we intended to resign as auditors after the completion of the 2016 audits and shared draft resignation documents with Lycamobile management in early April 2017.

'We delayed issuing the resignation at management's request.

'Given our clear stated intentions to resign, we were therefore surprised to receive a copy of a proposed shareholder resolution to dismiss us as auditors. As the resolution was subject to approval it was not immediately effective, and KPMG therefore proceeded as planned to resign as Lycamobile's auditors on 24 April 2017.'

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https://www.accountancydaily.co/kpmg-hangs-telco-operator-lycamobile

How would Subaskaran Allirajah and Lyca Group acquire Sri Lanka Telecom PLC

