



Lancer Container Lines Ltd.

POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

(Under Regulation 9A (5) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018)

Preface

The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 has mandated every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information. In this regard, Board of Directors have approved this policy and procedure of inquiry in case of leak of Unpublished Price Sensitive Information.

Objective

- i) To establish an effective internal procedure to inquire leak of UPSI or suspected leak of UPSI.
- ii) To initiate inquiry on becoming aware of leak of UPSI or suspected leak of UPSI and inform the stock exchange and Securities and Exchange Board of India ("SEBI") promptly of such leaks, inquiry and result of such inquiry.
- iii) To take disciplinary action against who are found guilty of violating this Code for Fair Disclosure and Conduct and for Prevention of Insider Trading.

DEFINITIONS

'Board' shall mean the Board of Directors of Lancer Container Lines Limited

'Company' means Lancer Container Lines Limited

'Designated Persons' The term "designated person" as defined under regulation 9(4) of SEBI (PIT) (Amendment) Regulations, 2018 shall include:

- I. Promoters of the Company;
- II. C.E.O and upto two level below C.E.O irrespective of their functional role or access to UPSI of the company.
- III. Any support staff such as IT Staff or secretarial Staff who have access to UPSI.
- IV. Employees designated by board on the basis of their functional role or access to UPSI of the company.
- V. Employees of material subsidiaries on the basis of their functional role or access to UPSI of the company.

'Immediate relative' means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities

CIN : L74990MH2011PLC214448

Registered Office : Mayuresh Chambers Premises Co-Op.Society Ltd, Unit No.H02-2, H02-3 & H02-4,
Plot No.60, Sector-11, CBD Belapur, Navi Mumbai - 400614

Tel. : +91 22 2756 6940/41/42 | Email : info@lancermarine.in | Web.: www.lancermarine.in

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'Unpublished Price Sensitive Information' (UPSI) : Any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel;

Procedure to inquire into leak of UPSI or suspected leak of UPSI

1. Constitution of inquiry committee

The inquiry committee comprises of Audit Committee Chairman, Chief Executive Officer of the company, and the Compliance Officer of the company.

2. Responsibilities of Compliance Officer

The compliance officer is responsible to initiate inquiry on becoming aware of leak of UPSI or suspected leak of UPSI. Report the relevant facts of the incident of actual or suspected leak of UPSI to the inquiry committee.

Disclose promptly of such leaks, inquiry and result of such inquiry to stock exchange and Securities and Exchange Board of India ("SEBI").

3. Procedure of inquiry in case of leak of UPSI or suspected leak of UPSI

1. The compliance officer shall initiate inquiry *suo moto* or based on a written complaint received.
2. The compliance officer will collect all possible information to ascertain the truth or otherwise allegation contained in the information or complaint.
3. The Compliance officer and Chief Executive officer will examine the genuineness of the case based on the initial facts of the case available.
4. Based on the outcome of the discussion the Compliance Officer and Chief Executive Officer will call an inquiry committee to initiate inquiry about Leak of UPSI or suspected leak of UPSI.
5. The Compliance officer disclose to Stock Exchange and SEBI about the suspected leak of UPSI.
6. The inquiry Committee may authorize any person(s), as it may deem fit, as supportive staff to compliance officer for assisting in investigation and collection of relevant fact, material substances on actual or suspected leak of UPSI.
7. The Compliance officer will collect necessary available material in support of the allegations. The compliance officer may call the employee, send email, an enquire the other people in the organisation in respect of leakage.

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8. The compliance officer place before the inquiry committee his findings along with the necessary documentary evidence.
9. Inquiry Committee shall consider the matter and if required may call people for inquiry or other additional documents and finalise the outcome and determine whether he is guilty or not and put forward its recommendation to the Board of Directors.
10. The Board of directors, on receipt of report from inquiry committee and after due review, if the person is found guilty of leak of UPSI or suspected leak of UPSI, then it will order for necessary disciplinary proceedings, such as wage freeze, suspension, recovery, termination of employment contract/agreement etc., as may be decided by the board members which will be in addition to the penal provisions stated under SEBI Act, 1992.
11. Thereafter the compliance officer will intimate to Stock exchange and SEBI about the outcome of the investigation and disciplinary actions taken by the company.

This policy will come in force from 28th March, 2019 date of approval of Board Meeting.

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FORMAT FOR INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI TO THE STOCK EXCHANGES

To,
BSE LTD.
P.J. Towers, Dalal Street
Mumbai -400 001

Sub: INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI

Ref: Lancer Container Lines Limited, Scrip Code -539841

Dear Sir / Madam,

Pursuant to Regulation 30 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2018 we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of offender	
Name of company	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action initiated by the Company?	yes, narration of the same

For Lancer Container Lines Limited

Anchal Gupta

Company secretary and compliance officer

CIN : L74990MH2011PLC214448

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FORMAT FOR REPORTING ACTUAL OR SUSPECTED LEAK OF UPSI TO THE SEBI

To,
Securities and Exchange Board of India
Plot No. C 4-A, G Block,
Near Bank of India, Bandra Kurla Complex,
Bandra East,
Mumbai – 400 051

Sub: INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI

Ref: Lancer Container Lines Limited, Scrip Code –539841

Dear Sir,

pursuant to regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of offender	
Name of company	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action initiated by the Company?	yes, narration of the same

For Lancer Container Lines Limited

Anchal Gupta

Company secretary and compliance officer

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