



No. SMD/LF-Form-32/2014-794

December 23, 2014

Mr. Imran R. Ibrahim,
Director,
Shell Pakistan Limited,
Shell House 6, Ch. Khaliquzzaman Road,
Karachi.

Subject: WARNING WITH RESPECT TO LATE FILING OF RETURNS OF BENEFICIAL OWNERSHIP

This refers to two returns of beneficial ownership on Form-32 for receipt of bonus shares, filed by you as a director/beneficial owner of Shell Pakistan Limited ("Company").

2. In this connection, attention is invited to Section 222 of the Companies Ordinance, 1984 which provides that, inter alia, a Director of a listed company is required to submit to the registrar and the Commission Form-31 containing the prescribed particulars pertaining to the beneficial ownership in the company and to notify on Form-32 the particulars of any change in the beneficial ownership. Section 222(2) of the Ordinance prescribes the period within which the Form 32 is required to be submitted to the registrar and the Commission as under:-

"where there is any change in the position or interest as aforesaid including a change in the beneficial ownership of any equity, security, within fifteen days of such change".

3. Thus, you were required to file the aforementioned returns of beneficial ownership with the Commission, within 15 days of the change in beneficial ownership. But, the said returns have been submitted on 25/08/2014 with the delay ranging from 80 days to 815 days, in contravention of Section 222 of the Ordinance, which prima facie attracts penal provisions contained in Section 224(4) of the Ordinance.

4. However, I am directed to communicate that on this occasion, lenient view of the matter has been taken and the aforementioned returns of beneficial ownership has been accepted. Further, you are strictly warned to ensure timely compliance of Section 222 of the Ordinance in future.


(Muhammad Farooq)
Joint Director (BO)

C.C:

Company Secretary, Shell Pakistan Limited, Shell House 6, Ch. Khaliquzzaman Road,
Karachi, with the request to ensure compliance.