

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২২০

তারিখঃ ফেব্রুয়ারি ০৬, ২০২৫

Arbim Techo Ltd

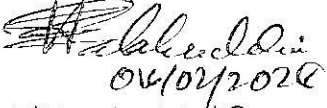
(BOID: 1201820068895861)

House no. 51, Nayapalton (4th Floor)

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২১৯ তারিখঃ ফেব্রুয়ারি ০২, ২০২৫এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


০৬/০২/২০২৫

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

IP PABX: 88-02-09609-100600, Ext- 1220

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2003-0097]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

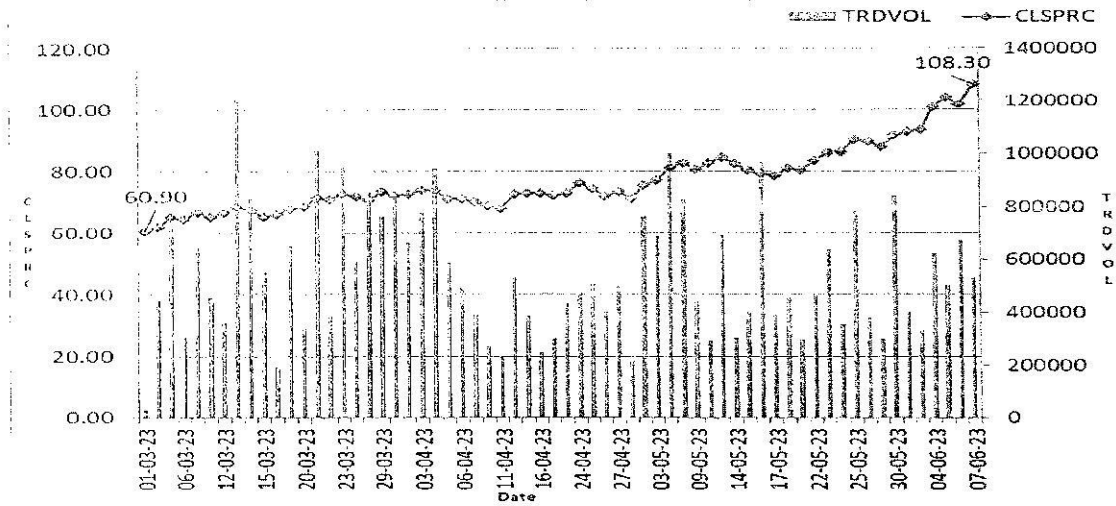
আদেশ

যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অথ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন বা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, জুন ১১, ২০২৩ তারিখের DSE Surveillance Note # 42/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii)

ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০২.০৩.২০২৩ থেকে ০৭.০৬.২০২৩ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS) -এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Trends of closing price and trade volume OF "FINEFOODS" in public market



Yesterday Closing Price (YCP) of the share of FINE FOODS LIMITED as on 02-03-2023 was Tk. 60.90 and closing price of the same was Tk. 108.30 as on 07-06-2023. During this period from 02-03-2023 to 07-06-2023, price of the share of FINE FOODS LIMITED was increased by Tk. 47.40 which is approximately 77.83% higher compared to closing price of 01-03-2023.

Observations and findings:

A. Trade details of Mohammad Shamsul Alam and associates:

Observation- 1:

Mohammad Shamsul Alam (Client code # 22232 of Stock & Bond Limited) was the 7th top buyer of FINEFOODS share from 02-03-2023 to 07-06-2023. After examining the relevant documents, it was found that the said client was associated with another account(s) from which they traded shares of "FINEFOODS" during the investigation period. Details are as follows:

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BOID	CLIENT	Company Name	Company Type	MR FATHER/	BO	Relationship
1203510068173076	22232	Mohammad Shamsul Alam	Stock & Bond Limited	Md. Abdur Rob	Ambia Khatun	Joint A/C maintained with his wife Sajiya Jasmin Mohammad Shamsul Alam,
		Ltd	Securities Limited			is the contact person & first applicant of this BOID
1205720075603052	04008	A A A Agro Enterprise	NIL Securities Limited			Mohammad Shamsul Alam, CEO of A A A Agro Enterprise is the contact
1203510066591329	22260	Mohammed Jahangir Alam	Stock & Bond Limited	Md. Abdur Rob	Ambia Khatun	Brother of Mohammad Shamsul Alam, Director of Arbim Techo Ltd
1602170066475452	4733	Sajiya Jasmin	Mercantile Bank Securities Limited	A.B.M Ziya	Rasheda Khanam	Wife of Mohammad Shamsul Alam
1203510068907832	22246	Sultana Parvin	Stock & Bond Limited	Md. Abdur Rob	Ambia Khatun	Sister of Mohammad Shamsul Alam

- a) Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by Mohammad Shamsul Alam and associates and gain and loss statement are given below:



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Date	Code #22332		Code #H0344		Code #C		Code #22260		Code #4733		Code #222	
	BOID#1203510668173076	MOHAMMAD SHAMSUL ALAM	BOID#120182006895861	ABIN TECH LTD	AAA AGROE	SPRSE	BOID#120351066551329	M OHAMMED JAHANGIR ALAM	BOID#160170066475452	SUFIYA JASWIN	BOID#120351006	SULTANA RAF
	Stock & Bond Limited		BRAC Ltd. Stock & Bond Limited		NU Securities Limited		Stock & Bond Limited		Mercantile Bank Securities Limited		Stock & Bonds	
	Buy Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)
22-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	279100	805517	497506	661759	653937	4389	4600	8100	0	375000	160816	254

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a) Effects of "FINEFOODS" at DSE (both in Public Market and Block Market) by Mohammad Shan Alam and Associates

Date	Buy			Sell			Stock Position			Market		
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Price (W.Avg.)	Qty.	Amount	Buy	Chart Sub (%)	Chart 12 (%)
Opening Balance												
02-03-2023	36591	60.87	2227407.70	36170	60.16	218576.00	61.72	1372730	84783697.62			
05-03-2023	277016	42.92	17429131.10	209596	62.93	13066690.90	61.70	1474151	89779562.52			
06-03-2023	64278	64.42	4140706.90	12985	64.96	843522.00	61.90	1441571	89234516.35			
07-03-2023	114242	65.97	7536949.70	148555	64.84	9601432.00	62.01	1491864	92670044.73			
09-03-2023	82912	65.47	5428228.40	63394	66.18	420575.00	62.46	1458851	9085470.65			
12-03-2023	124584	65.93	8214356.40	133000	63.21	84074.00	62.46	1474069	92322030.27			
13-03-2023	149504	67.52	10094296.70	150599	67.75	103166.00	62.73	146063	92191133.68			
14-03-2023	70034	70.27	4921166.70	115930	60.63	702998.00	63.17	1425558	90246666.70			
15-03-2023	10000	66.40	664000.00	135644	66.00	89530.40	63.53	1457012	9080339.95			
16-03-2023	2	66.80	133.60	0	0.00	0.00	0.00	1257014	7085470.35			
19-03-2023	58063	68.11	3954414.00	52000	68.18	355000.00	63.73	1260773	70857603.95			
23-03-2023	0	0.00	0.00	57051	73.51	419705.70	63.73	1260773	70857603.95			
27-03-2023	0	0.00	0.00	360511	73.19	2635737.06	63.73	1260773	70857603.95			
28-03-2023	25000	71.20	1779912.30	368032	70.89	2635737.06	63.73	1260773	70857603.95			
29-03-2023	83339	70.00	5834080.80	347468	71.34	2480340.80	63.84	1260773	70857603.95			
30-03-2023	20000	72.26	1445200.00	0	0.00	0.00	64.80	1260773	70857603.95			
02-04-2023	0	0.00	0.00	8854	71.30	630.00	0.00	1260773	70857603.95			
03-04-2023	0	0.00	0.00	16839	75.91	1273249.00	65.38	1260773	70857603.95			
04-04-2023	140500	74.76	10503466.00	41000	74.40	3035000.00	68.91	1260773	70857603.95			
05-04-2023	0	0.00	0.00	43043	73.39	3157340.00	68.91	1260773	70857603.95			
06-04-2023	0	0.00	0.00	30118	71.77	216063.80	68.91	1260773	70857603.95			
11-04-2023	43149	67.34	2931658.10	0	0.00	0.00	0.00	1260773	70857603.95			
12-04-2023	151850	70.31	10676795.00	68414	70.07	480784.00	69.29	1260773	70857603.95			
13-04-2023	80929	72.40	5859083.80	0	0.00	0.00	0.00	1260773	70857603.95			
16-04-2023	0	0.00	0.00	18194	72.81	132689.70	69.83	1260773	70857603.95			
17-04-2023	0	0.00	0.00	86929	74.17	64519.20	69.83	1260773	70857603.95			
25-04-2023	121044	76.40	9246584.20	60000	75.14	450589.80	69.83	1260773	70857603.95			
27-04-2023	0	0.00	0.00	121034	77.14	93452.10	71.48	1260773	70857603.95			
02-05-2023	267229	74.34	19865635.80	102500	75.83	775000.00	72.82	1260773	70857603.95			
03-05-2023	62004	77.14	4782996.30	25000	77.58	1960750.00	73.33	1260773	70857603.95			
07-05-2023	63625	76.34	4856991.70	0	0.00	0.00	0.00	1260773	70857603.95			
08-05-2023	113114	81.29	9195424.60	93409	81.41	76687.90	74.93	1260773	70857603.95			
09-05-2023	0	0.00	0.00	999	80.70	80.70	74.93	1260773	70857603.95			
16-05-2023	90628	82.60	7485537.20	421246	81.15	34549.00	74.93	1260773	70857603.95			
18-05-2023	11568	77.00	890736.00	0	0.00	0.00	75.96	1260773	70857603.95			
23-05-2023	30000	86.32	2589538.50	11568	82.00	9576.00	76.01	1260773	70857603.95			
24-05-2023	15000	86.80	1302000.00	0	0.00	0.00	77.09	1260773	70857603.95			
25-05-2023	200000	80.00	16000000.00	32000	87.15	2800.00	78.71	1260773	70857603.95			
28-05-2023	31000	84.50	2619500.00	0	0.00	0.00	0.00	1260773	70857603.95			
29-05-2023	500	88.80	44400.00	0	0.00	0.00	0.00	1260773	70857603.95			
01-06-2023	0	0.00	0.00	1000	92.60	92.60	0.00	1260773	70857603.95			
06-06-2023	0	0.00	0.00	142848	101.80	14526.40	79.12	1260773	70857603.95			
07-06-2023	25000	94.00	2350000.00	57152	97.69	5469.00	80.16	1260773	70857603.95			

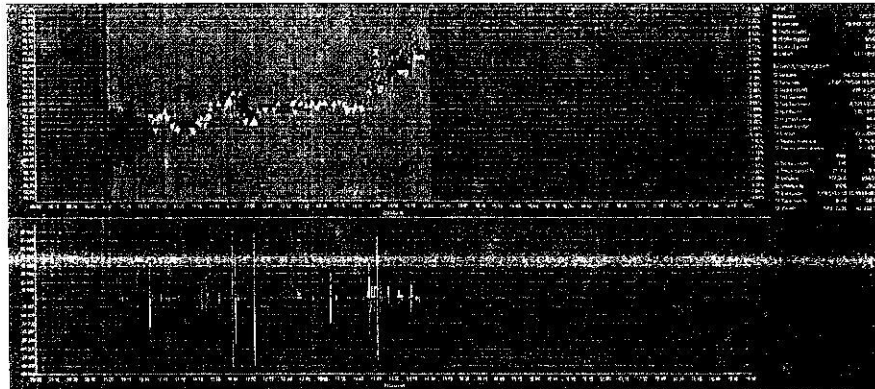
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market):

The Investigation Team of IED collected Trade monitoring screenshots from the Enforcement Department of SEC on some trading date(s), where approximately 146 trades of Mohammad Shamsul Alam and associates were observed which influenced to uplift the price of shares of 'FINEFOODS' during the investigation period.

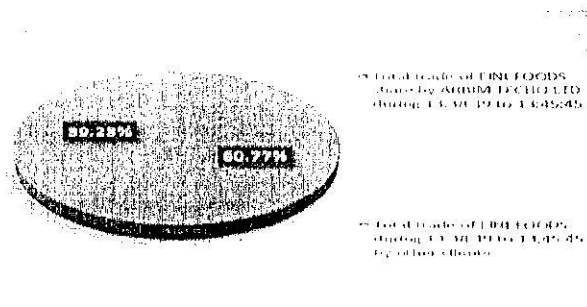
BOID: 1203510068173076, 1201820068895861, 1205720075603052,
1203510066591329, 1602170066475452, 1203510068907832 (combined)

05-03-2023



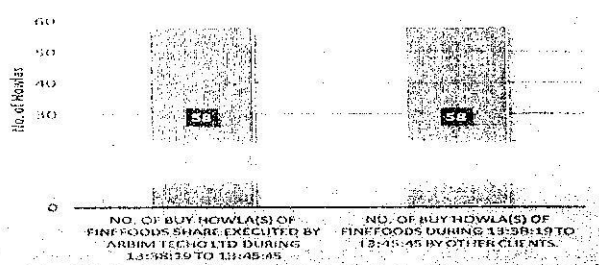
It was observed in the above graph that on 05-03-2023, total number of trades of FINEFOODS in the market was 682, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 146 which is approximately 21.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 721,575 whereas buy volume by the said client(s) was 137,015 which is approximately 18.99% of the total traded volume in the market.

On 05-03-2023, trading of FINEFOODS share was started at Tk. 63.30 which is Tk. 1.10 more than the YCP of Tk. 62.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 13:38:19 at price Tk. 63.50 and induced the same to rise to Tk. 64.80 up to 13:45:45. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates bought 73,352 shares of FINEFOODS compared to the total traded share of 120,709. This is shown in the following Pie Chart.



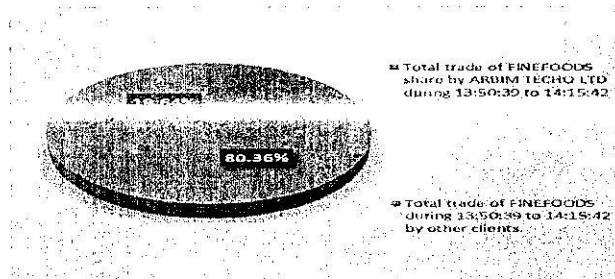
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It is also found that during the time period from 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates executed 58 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.

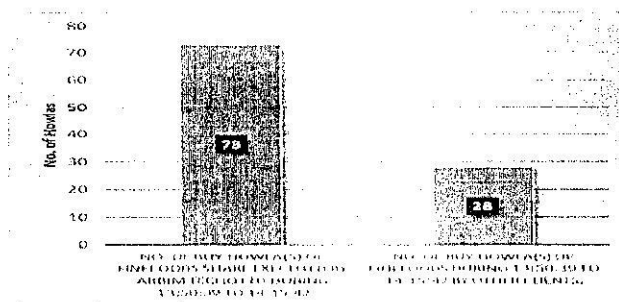


It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 60.77% of the total trades of FINEFOODS shares by executing 58 of total 116 howlas from 13:38:19 to 13:45:45 on 05-03-2023. From 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 63.50 to Tk. 64.80 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share.

Besides, on that day, Mohammad Shamsul Alam and associates started series of trading at 13:50:39 at price Tk. 64.10 and induced the same to rise to Tk. 66.40 up to 14:15:42. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates bought 51,139 shares of FINEFOODS compared to the total traded share of 63,638. This is shown in the following Pie Chart.

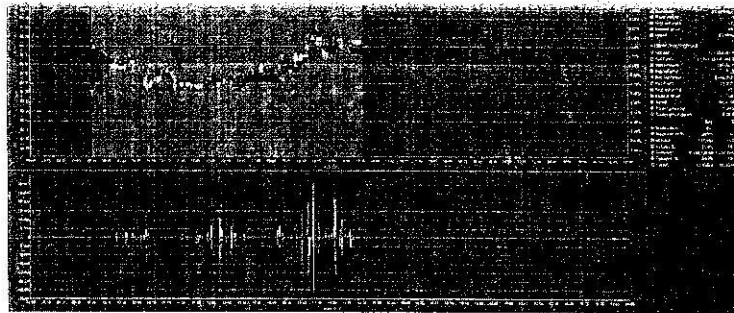


It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 73 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 101 as shown in the following Bar Chart.



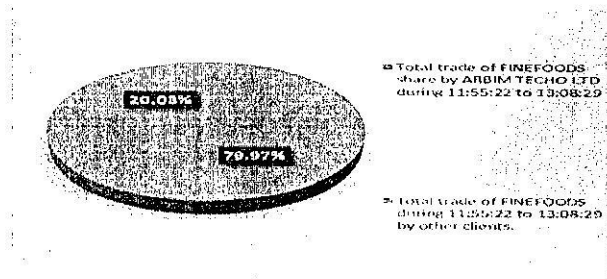
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associates bought 80.36% of the total trades of FINEFOODS shares by executing 73 of total 101 howlas from 13:50:39 to 14:15:42 on 05-03-2023. From 13:50:39 to 14:15:42, at 13:50:39 the price of FINEFOODS share was Tk. 66.40 (induced the price by Tk. 2.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 3.10 which is approximately 4.98% higher than YCP.



It was observed in the above graph that on 12-03-2023, total number of trades of FINEFOODS in the market was 698, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 202 which is approximately 28.94% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 361,964 whereas buy volume by the said client(s) was 124,584 which is approximately 34.42% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-03-2023 in trading of FINEFOODS share.

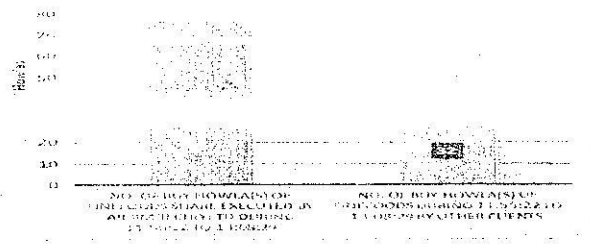
On 12-03-2023, trading of FINEFOODS share was started at Tk. 66.80 which is Tk. 1.50 more than the YCP of Tk. 65.30. On that day, Mohammad Shamsul Alam and associates started series of trading at 11:55:22 at price Tk. 64.60 and induced the same to rise to Tk. 65.90 up to 13:08:29. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates bought 50,377 shares of FINEFOODS compared to the total traded share of 62,995. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 77 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 109 as shown in the following Bar Chart.

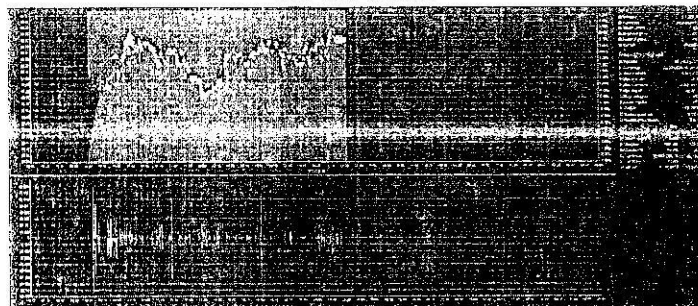
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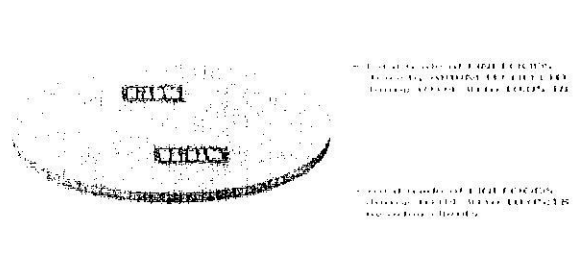
associates bought 79.97% of the total trades of FINEFOODS shares by excluding 77 of total 109 howlas from 11:55:22 to 13:08:29 on 12-03-2023. From 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 64.60 to Tk. 65.90 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.40 which is approximately 2.14% higher than YCP.

13-03-2023



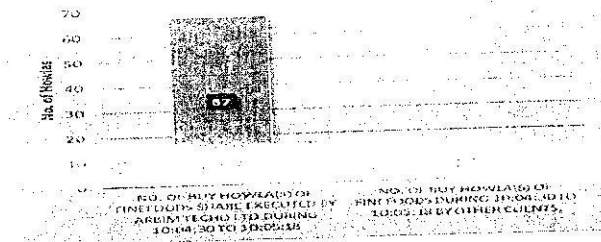
It was observed in the above graph that on 13-03-2023, total number of trades of FINEFOODS in the market was 1841, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 118 which is approximately 6.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 1,208,313 whereas buy volume by the said client(s) was 149,504 which is approximately 12.37% of the total traded volume in the market.

On 13-03-2023, trading of FINEFOODS share was started at Tk. 65.60 which is Tk. 1.10 less than the YCP of Tk. 66.70. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:04:30 at price Tk. 67.30 and induced the same to rise to Tk. 67.70 up to 10:05:18. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates bought 71,722 shares of FINEFOODS compared to the total traded share of 78,122. This is shown in the following Pie Chart.



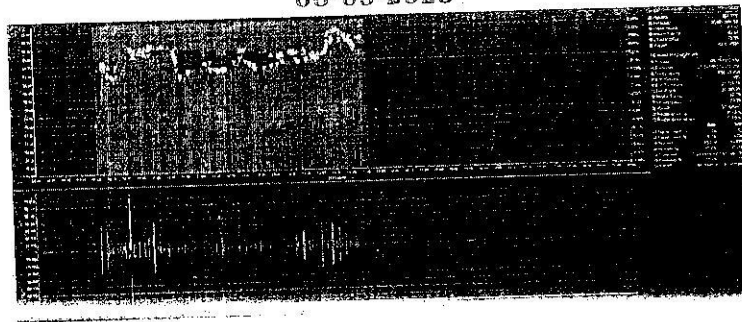
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... .. stated period. Mohammad Shamsul Alam and associates executed 67 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 71 as shown in the following Bar Chart.



it is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 91.81% of the total trades of FINEFOODS shares by executing 67 of total 71 howlas from 10:04:30 to 10:05:18 on 13-03-2023. From 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 67.30 to Tk. 67.70 (induced the price by Tk. 0.40). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 2.10 which is approximately 3.15% higher than YCP.

08-05-2023

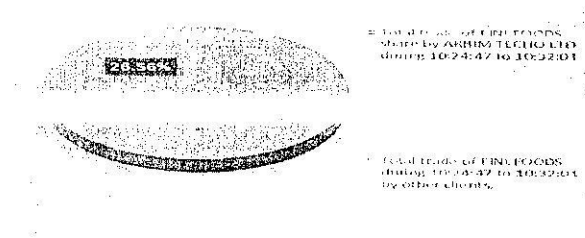


It was observed in the above graph that on 08-05-2023, total number of trades of FINEFOODS in the market was 1112, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 74 which is approximately 6.65% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 831,479 whereas buy volume by the said client(s) was 93,114 which is approximately 11.20% of the total traded volume in the market.

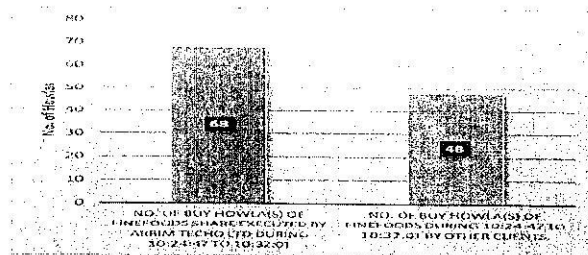
On 08-05-2023, trading of FINEFOODS share was started at Tk. 78.00 which is Tk. 3.20 less than the YCP of Tk. 81.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:24:47 at price Tk. 81.30 and induced the same to rise to Tk. 82.50 up to 10:32:01. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates bought 90,414 shares of FINEFOODS compared to the total traded share of 123,115. This is shown in the following Pie Chart.

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associates executed 68 howlas to purchase 68 shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 73.44% of the total trades of FINEFOODS shares by executing 68 of total 116 howlas from 10:24:47 to 10:32:01 on 08-05-2023. From 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 81.30 to Tk. 82.50 (induced the price by Tk. 1.20). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.60 which is approximately 1.97% higher than YCP.

Summary of the trade by Mohammad Shamsul Alam and associates:

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
750736	71.05	56334955.00	75405	72.45	47287712.10	2,562,695.00	72.13	184843351.30	3,662,078.00	73.56	269391374.90	67.62	247636664.99	274347	80.16	21992363.93

d. Gain and Loss by Mohammad Shamsul Alam and associates from 02.03.2023 to 07.06.2023:

Realized Capital gain(loss)per unit	5.94	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.78%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	21,154,709.91	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (07-06-2023)	108.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	28.14	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	35.10%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	1,119,916.17	Quantity of Stock Position x Unrealized gain (loss) per unit

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bought 2562695 shares and sold 3662078 shares of FINEFOODS from public market during the period from 02-03-2023 to 07-06-2023. With the said BO accounts, Mohammad Shamsul Alam and associates had sold 462604 shares of FINEFOODS and realized a capital gain/loss of Tk. 21754709.91 from the trading of FINEFOODS share during the investigation period. They had also unrealized gain/loss of TK. 7719416.17 during the period.

As per section 17 of the Securities and Exchange Ordinance, 1989, "No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(v) directly or indirectly effect a series of transactions in any security creating an appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is evident that **Mohammad Shamsul Alam and associates** were involved directly and indirectly in a series of transactions of shares of 'FINEFOODS' with their aforesaid BO accounts in order to create an appearance of active trading and raising of price of the said share.

Contravention(s)-1:

Mohammad Shamsul Alam and associate(s) have violated the following:

- Section 17(1)(v) of the Securities and Exchange Ordinance, 1989, whereby and indirectly effecting a series of transactions of shares of "FINEFOODS" creating an appearance of active trading therein and raising price of the said share.

Observation-2:

After analyzing the trade pattern of the clients, the investigation team found that MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) were involved in trading in shares of "FINEFOODS" within the investigation period and these accounts are acting as counter party of each other for 237125 shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period. Detail of the above mentioned trade is as follows:



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Table 3.3: DSE Trade Data by Instrument Code

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOID SELLER	MARKET TYPE
28-03-23	11:28:32	279959948	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959949	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959950	FINEFOODS	1005	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:41	279959975	FINEFOODS	995	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:52:31	283924418	FINEFOODS	158	81	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:52:34	283924444	FINEFOODS	500	81	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963310	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:41:46	279963320	FINEFOODS	1769	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:41:46	279963321	FINEFOODS	231	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:41:46	279963327	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:41:46	279963334	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:41:46	279963340	FINEFOODS	919	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	11:42:04	279963402	FINEFOODS	1051	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
28-03-23	12:01:23	279967884	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEENLS	04008	1205720075603052	Public
16-05-23	12:36:59	283915856	FINEFOODS	3211	81.3	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
16-05-23	12:36:59	283915857	FINEFOODS	1789	81.3	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
16-05-23	12:59:29	283928406	FINEFOODS	1900	81.5	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
12-04-23	10:50:05	281119325	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119382	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119383	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119384	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119385	FINEFOODS	900	69.7	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119435	FINEFOODS	900	69.8	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119437	FINEFOODS	100	69.8	DSEESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
07-03-23	10:55:21	278779320	FINEFOODS	1000	64.9	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985394	FINEFOODS	2750	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985395	FINEFOODS	3000	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985396	FINEFOODS	3000	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985397	FINEFOODS	1250	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:10:07	278976832	FINEFOODS	30000	65	DSEESBL	22232	1203510068173076	DSEENLS	04008	1205720075603052	Public
29-03-23	12:00:47	280044729	FINEFOODS	83168	70	DSEESBL	22232	1203510068173076	DSEENLS	04008	1205720075603052	Block
07-06-23	10:07:08	282791682	FINEFOODS	25000	93	DSEESBL	22232	1203510068173076	DSEMBL	4733	1602170066475452	Block
02-03-23	12:29:00	278428191	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428193	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428194	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428195	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428196	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428197	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428198	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428199	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428200	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:04:01	278807613	FINEFOODS	1000	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:04:44	278807862	FINEFOODS	1000	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:08:10	278808932	FINEFOODS	800	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	10:41:47	278771482	FINEFOODS	5000	64.2	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
07-03-23	14:18:55	278870326	FINEFOODS	1796	67.1	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:37	279065317	FINEFOODS	1750	67	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:41	279065325	FINEFOODS	5000	67	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:45	279065360	FINEFOODS	5000	67	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:49	279065371	FINEFOODS	5000	67	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
13-03-23	13:32:25	279161748	FINEFOODS	10000	68.2	DSEENLS	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
09-03-23	14:16:32	278982617	FINEFOODS	8000	66	DSEENLS	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985899	FINEFOODS	1000	66	DSEENLS	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985900	FINEFOODS	1000	66	DSEENLS	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985901	FINEFOODS	226	66	DSEENLS	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public

TOTAL HOWLA NO: 58

TOTAL TRADE VOLUME: 237125

(DSE trade data)



Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

As per section 17 of the Securities and Exchange Ordinance, 1969 (XVII of 1969), "No person shall for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which

(ii) create a false and misleading appearance of active trading in any securities;

It is found that associates of Mohammad Shamsul Alam and associates acted as counter party of each other for 237125 shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period.

Contravention(s)-2:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- Section 17(e)(ii) of Securities and Exchange Ordinance, 1969 by executing trades that created a false and misleading appearance of active trading in securities.

Observation-3:

As per the DSE trade data, it was observed that Mohammad Shamsul Alam and associates had collectively acquired more than 10% shares of "FINEFOODS" during the investigation period. Details are given below:

Shareholding position of Mohammad Shamsul Alam and associates:

Sl. No	Client Name	BOID	Name of TREC Holder	Opening Balance	05-03-2023		06-03-2023		07-03-2023		09-03-2023		12-03-2023		13-03-2023	
					Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	ARBIM TECO LTD	1201820068895861	BRAC EPL Stock Brokerage Limited	160000	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	149329	1.07%
2	AAA AGRO ENTERPRISE	1205720075603052	NLI Securities Limited	829154	848898	6.07%	896565	6.42%	896615	6.42%	897262	6.42%	920894	6.59%	920894	6.59%
3	MOHAMMAD SHAMSUL ALAM	1203510068173076	Stock & Bond Limited	260981	308275	2.21%	311901	2.23%	289177	2.07%	324494	2.32%	291455	2.09%	261031	1.87%
4	MOHAMMED JAHANGIR ALAM	120351006659329	Stock & Bond Limited	8300	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%
5	SULTANA PARVIN	1203510068907832	Stock & Bond Limited	115295	115677	0.83%	115677	0.83%	104038	0.74%	87592	0.63%	88583	0.63%	88583	0.63%
Total holding of FINEFOODS by the aforesaid clients during the investigation period					1441150	10.31%	1492443	10.68%	1458130	10.43%	1477648	10.57%	1469232	10.51%	1428137	10.22%
Total No. of Outstanding Securities of FINEFOODS				13,973,918												

(DSE Trade data)

From the above table, it is observed that Mohammad Shamsul Alam and associates jointly hold more than 10% of the total paid up shares of FINEFOODS.

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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As per উপ-বিধি (১) (ক) of বিধি ২ of the বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮,

"..... (১) বিষয় বা প্রসঙ্গের পারিপার্শ্বিক কোন কিছু না থাকলে, এই বিধিমালায়, (ক) "আধিগ্রহণকারী" অর্থ এমন কোন ব্যক্তি যে নিজে বা অন্য কাহারো সহিত সম্মিলিত হইয়া (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে রূপান্তরযোগ্য সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন প্রস্তাব করে....."

As per বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

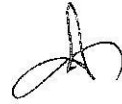
"এক্সচেঞ্জ হইতে নগদ অর্থের বিনিময়ে উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন বা অধিগ্রহণ। (১) কোন কোম্পানিতে উল্লেখযোগ্য সংখ্যক এর কম কোন শেয়ারের ধারক বা ধারকগণ, বা যিনি বা বাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিগণ, এক্সচেঞ্জ হইতে উক্ত কোম্পানির কোন শেয়ার অর্জন বা অধিগ্রহণ করিতে চাহিলে অর্জন বা অধিগ্রহণ পরবর্তী ধারণকৃত মোট শেয়ারের পরিমাণ যদি ১০(দশ) শতাংশ বা উহার অধিক পর্যায়ে উন্নীত হয় অথবা ১০(দশ) শতাংশ বা উহার অধিক কোন শেয়ার ধারক বা ধারকগণ এক্সচেঞ্জের মাধ্যমে উক্ত কোম্পানির আরও শেয়ার অর্জন বা অধিগ্রহণের ক্ষেত্রে তাহাকে তফসিল-১ বর্ণিত পদ্ধতিতে একটি ঘোষণা কোম্পানিটি যে এক্সচেঞ্জে তালিকাভুক্ত সেই এক্সচেঞ্জে সংশ্লিষ্ট অধিগ্রহণকারীর স্টক ব্রোকার বা মার্চেন্ট ব্যাংকারের মাধ্যমে দাখিল করিতে হইবে।"

However, it is found that **Mohammad Shamsul Alam and associates** jointly hold more than 10% shares of 'FINEFOODS' on the aforesaid dates.

Contravention(s)-3:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1203720073000002), MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of "FINEFOODS" without complying the requirements of the said rules.



المجلس الأعلى للبحوث والدراسات الإسلامية - بيروت

6. 4. 4. 4. 11 5. 4. 4. 4. 11

Total

ARCHIVE RECORD 0111

والتحليل في هذه الحالة يكون كالتالي:

A

১৯৭১-৭২-এর মাস ১৭(৫) (ii), ১৭(৫) (v) আইন এবং বিধি ০৭(১) বাংলাদেশ সিকিউরিটিজ
আইন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ লঘনের অভিযোগ হতে

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