Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৮৬
তারিখঃ মার্চ ১৯, ২০২৫

Beacon Medicare Ltd.
(BOID: 1203710064190682)
9/A, Toyenbee Circular Road
Motijheel C/A, Dhaka-1000.

বিষয়: আদেশ।

কমিশনের আদেশ নং- **বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৮৫ তারিখঃ মার্চ ১৯, ২০২৫** এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

Salahuddin
১৯/০৩/২০২৫

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 সদস্য কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমএসআই, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2023-1111]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৮৫ তারিখঃ মার্চ ১৯, ২০২৫

আদেশ

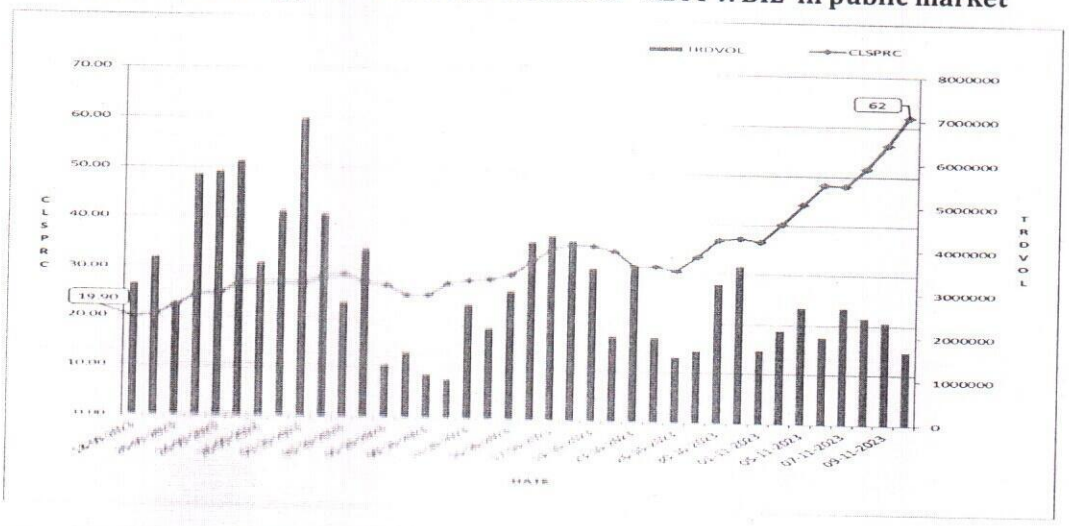
যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, নভেম্বর ১৩, ২০২৩ তারিখের DSE Surveillance Note-81/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ১৯ সেপ্টেম্বর ২০২৩ হতে ১২ নভেম্বর ২০২৩ পর্যন্ত সময়ে Khan Brothers PP Woven Bag Industries Limited (KBPPWBIL) -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:

Description of alleged violation of securities laws:

Pursuant to DSE Surveillance Note-81/2023 dated November 13, 2023 and in exercise of the power conferred by Regulation 16(3)(c)(ii) and (d)(v) of the Dhaka Stock Exchange (Board and Administration) Regulations, 2013, the investigation team of DSE investigated the share trading of Khan Brothers PP Woven Bag Industries Limited (KBPPWBIL) for the period from 19.09.2023 to 12.11.2023 and prepared this report. The investigation committee submitted the investigation report to the Commission. The investigation team randomly examined the documents collected from different TREC holders of clients regarding share trading of Khan Brothers PP Woven Bag Industries Limited. From the investigation report it appears, among others, that:

Trends of closing price and trade volume OF 'KBPPWBIL' in public market



YCP of the shares of 'KBPPWBIL' as on 19.09.2023 was Tk. 19.90 and closing price of the same was Tk. 62 as on 12.11.2023. During this period from 19.09.2023 to 12.11.2023, price of the shares of 'KBPPWBIL' was increased by Tk. 42.10 which is approximately 211.56% higher compared to closing price as on 18.09.2023

A. Trading of *Mohammad Ebadul Karim and his associates*:

Observation-1:

Mohammad Ebadul Karim (client code # 3371 of AB Securities Limited) was one of the top buyers of shares of 'KBPPWBIL' for the period from 19.09.2023 to 12.11.2023. It is observed that *Mohammad Ebadul Karim and his associates* used 09 (eight) more accounts for trading 'KBPPWBIL' shares during the investigation period. The details of the same are delineated as follows:

Sl. No.	Name of the BO Account Holder(s)	BOID	Client code	Name of Depository Participant	Relationship/ Remarks
1.	Risana Karim & Ehtiaz Karim	1205590075153283	11788	UCB Stock Brokerage Limited	Risana Karim and Ehtiaz Karim are the daughter and son-in-law of Mohammad Ebadul Karim respectively
2.	Risana Karim	1203710043493921	3214	AB Securities Limited	Daughter of Mohammad Ebadul Karim
3.	Risana Karim	1205590043493921	11755	UCB Stock Brokerage Limited	Daughter of Mohammad Ebadul Karim
4.	Risana Karim & Ehtiaz Karim	1601880075153283	10114	MTB Securities Limited	Risana Karim and Ehtiaz Karim are the daughter and son-in-law of Mohammad Ebadul Karim respectively
5.	Beacon Medicare Ltd.	1203710064190682	5058	AB Securities Limited	Mohammad Ebadul Karim is the Chairman of Beacon Medicare Ltd. He is the contact person of the BO account as well.
6.	Beacon Medicare Ltd. Empl's CPF	1203710073922456	5565	AB Securities Limited	Mohammad Ebadul Karim is the Chairman of Beacon Medicare Ltd. He is the 1st applicant of the BO account as well.
7.	Beacon Developments Limited	1205590054811592	11680	UCB Stock Brokerage Limited	Mohammad Ebadul Karim is the Managing Director of Beacon Developments Limited
8.	Mohammad Ebadul Karim	1203710046187231	3371	AB Securities Limited	Individual account
9.	Mohammad Ebadul Karim	1601880046187231	10310	MTB Securities Limited	Individual account
10.	Md. Sohel Alam	1601880043377493	23176	MTB Securities Limited	Brother-in-law of Mohammad Ebadul Karim

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Individual trade pattern in public market, Effects of 'KBPPWBIL' in both block and public market, Trade monitoring screenshots and Gain/Loss of *Mohammad Ebadul Karim and his associates* by trading of 'KBPPWBIL' share are given below:

a) **Individual trade pattern of *Mohammad Ebadul Karim and his associates* in public market:**

Date	Code # 11788				Code # 3214				Code # 11755				Code # 10114			
	BO ID # 1205590075153283				BO ID # 1203710043493921				BO ID # 1205590043493921				BO ID # 160188007515328			
	Risana Karim & Ehtiaz Karim				Risana Karim				Risana Karim				Risana Karim & Ehtiaz Kari			
	UCB Stock Brokerage Limited				AB Securities Limited				UCB Stock Brokerage Limited				MTB Securities Limited			
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg
19-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-09-2023	0	0.00	0	0.00	0	0.00	10000	21.90	0	0.00	0	0.00	0	0.00	0	0.00
21-09-2023	210846	24.45	642421	24.50	0	0.00	10000	24.50	0	0.00	0	0.00	0	0.00	0	0.00
24-09-2023	409423	25.15	53228	25.00	10000	24.80	10000	25.50	0	0.00	0	0.00	0	0.00	0	0.00
25-09-2023	0	0.00	554674	26.60	5000	25.80	76663	26.15	0	0.00	0	0.00	0	0.00	0	0.00
26-09-2023	252317	26.81	480	26.70	10000	26.50	5000	27.30	0	0.00	0	0.00	0	0.00	48000	26.90
27-09-2023	345000	27.07	0	0.00	10000	26.90	10000	27.20	0	0.00	0	0.00	0	0.00	0	0.00
01-10-2023	30676	26.60	30676	27.20	55000	25.55	10000	25.00	0	0.00	0	0.00	0	0.00	0	0.00
02-10-2023	350000	27.23	416659	28.37	0	0.00	10000	26.70	0	0.00	0	0.00	0	0.00	0	0.00
03-10-2023	79500	28.22	0	0.00	0	0.00	55000	28.34	0	0.00	0	0.00	0	0.00	0	0.00
04-10-2023	0	0.00	0	0.00	35000	27.37	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-10-2023	0	0.00	0	0.00	35000	25.56	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-10-2023	0	0.00	0	0.00	12500	24.40	12500	24.80	0	0.00	0	0.00	0	0.00	0	0.00
10-10-2023	0	0.00	0	0.00	0	0.00	30000	26.67	0	0.00	0	0.00	0	0.00	0	0.00
11-10-2023	0	0.00	0	0.00	8500	27.42	8500	27.86	0	0.00	0	0.00	0	0.00	0	0.00
12-10-2023	0	0.00	0	0.00	10000	27.85	5000	28.30	0	0.00	0	0.00	0	0.00	0	0.00
15-10-2023	0	0.00	0	0.00	5000	28.60	25000	28.86	0	0.00	0	0.00	0	0.00	0	0.00
16-10-2023	0	0.00	0	0.00	0	0.00	20000	29.80	0	0.00	0	0.00	0	0.00	0	0.00
17-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	33.20	0	0.00
19-10-2023	0	0.00	0	0.00	0	0.00	5000	35.40	0	0.00	0	0.00	0	0.00	0	0.00
22-10-2023	0	0.00	0	0.00	15000	33.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-10-2023	0	0.00	0	0.00	25000	31.95	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-10-2023	0	0.00	0	0.00	25000	30.76	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-10-2023	0	0.00	0	0.00	0	0.00	20000	33.40	0	0.00	0	0.00	0	0.00	0	0.00
30-10-2023	0	0.00	0	0.00	15000	35.77	45000	35.91	83300	35.67	0	0.00	0	0.00	0	0.00
31-10-2023	497647	36.51	0	0.00	10000	35.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-11-2023	0	0.00	0	0.00	0	0.00	15000	36.68	0	0.00	0	0.00	0	0.00	0	0.00
02-11-2023	0	0.00	0	0.00	0	0.00	10000	37.00	0	0.00	0	0.00	0	0.00	0	0.00
12-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	2175409		1698138		286000		392663		83300		0		50000		48000	

Date	Code # 5058				Code # 5565				Code # 11680				Code # 3371			
	BO ID # 1203710064190682				BO ID # 1203710073922456				BO ID # 1205590054811592				BO ID # 1203710046187231			
	Beacon Medicare Ltd.				Beacon Medicare Ltd. Empl's CPF				Beacon Developments Limited				Mohammad Ebadul Karim			
	AB Securities Limited				AB Securities Limited				UCB Stock Brokerage Limited				AB Securities Limited			
	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Av
19-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	15000	19.07	26000	19.77
20-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	85000	21.84
21-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	24.50

Bangladesh Securities and Exchange Commission

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24-09-2023	0	0.00	0	0.00	60000	25.35	0	0.00	118839	24.97	118839	25.14	80000	24.43	150000	25.
25-09-2023	50000	26.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	30000	25.65	179399	26.
26-09-2023	50000	26.80	0	0.00	0	0.00	0	0.00	91098	26.97	91098	26.91	58000	26.58	48440	27.
27-09-2023	184000	27.04	140000	26.99	0	0.00	0	0.00	0	0.00	0	0.00	40000	26.78	55000	27.
01-10-2023	440000	26.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	65000	25.65	100000	26.
02-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	26.91	55000	27.
03-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000	28.30	15000	28.
04-10-2023	185000	28.11	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	70000	27.44	0	0.0
08-10-2023	136499	25.41	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	40000	25.25	0	0.0
09-10-2023	600	24.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.0
10-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.0
11-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000	27.30	0	0.0
12-10-2023	188940	28.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	40000	27.85	0	0.0
15-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.0
16-10-2023	100000	31.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	30000	31.2
17-10-2023	200000	33.85	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000	33.8
19-10-2023	82000	35.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	125000	34.88	0	0.0
22-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	33.73	0	0.0
23-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	45000	31.67	0	0.0
25-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	162351	31.36	0	0.0
26-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	120000	30.61	0	0.0
29-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	98089	33.00	0	0.0
30-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	84000	35.86	0	0.00	0	0.00	0	0.0
31-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100	35.40	75400	35.96	0	0.0
01-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	25000	36.46	0	0.0
02-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.0
12-11-2023	0	0.00	49867	61.99	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.0
Total	1617039		189867		60000		0		293937		210037		1168840		768839	

Date	Code # 10310				Code # 23176				Total					
	BO ID # 1601880046187231				BO ID # 1601880043377493									
	Mohammad Ebadul Karim				Md. Sohel Alam									
	MTB Securities Limited				MTB Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
19-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	15000	19.07	286000.00	26000	19.77	513900.00
20-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	95000	21.85	2075731.20
21-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	210846	24.45	5155725.40	672421	24.50	16474314.5(
24-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	678262	25.05	16989772.70	332067	25.16	8354488.60
25-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	85000	26.22	2228500.00	810736	26.43	21428562.8(
26-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	461415	26.80	12367250.20	193018	26.99	5209958.40
27-09-2023	0	0.00	0	0.00	0	0.00	0	0.00	579000	27.04	15655471.90	205000	27.10	5554934.80
01-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	590676	26.47	15637744.70	140676	26.24	3690887.20
02-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	400000	27.19	10875005.50	481659	28.28	13622136.8(
03-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	84500	28.22	2384650.00	70000	28.39	1987500.00
04-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	290000	27.86	8079220.70	0	0.00	0.00
08-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	211499	25.40	5372333.60	0	0.00	0.00
09-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	13100	24.41	319760.00	12500	24.80	310000.00
10-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	30000	26.67	800189.20
11-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	13500	27.37	369550.00	8500	27.86	236800.00
12-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	238940	27.97	6682407.20	5000	28.30	141500.00
15-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	5000	28.60	143000.00	25000	28.86	721500.00
16-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	100000	31.90	3190000.00	50000	30.64	1532000.00
17-10-2023	40000	32.90	0	0.00	0	0.00	0	0.00	290000	33.61	9746000.00	5000	33.80	169001.40
19-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	207000	35.09	7262629.90	5000	35.40	177000.00
22-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	35000	33.71	1180000.00	0	0.00	0.00
23-10-2023	0	0.00	0	0.00	40000	34.88	0	0.00	110000	32.90	3618819.60	0	0.00	0.00
25-10-2023	305470	31.15	0	0.00	0	0.00	0	0.00	492821	31.20	15376911.50	0	0.00	0.00

26-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	120000	30.61	3672730.00	0	0.00	0.00
29-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	98089	33.00	3236937.00	20000	33.40	668000.0
30-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	182300	35.77	6520286.20	45000	35.91	1616000.0
31-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	583047	36.42	21237021.10	100	35.40	3540.00
01-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	25000	36.46	911500.00	15000	36.68	550137.3
02-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	10000	37.00	370000.0
12-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	49867	61.99	3091202.0
Total	345470		0		40000		0		6119995			3307544		

b) Effects of 'KBPPWBIL' at DSE (both Public Market and Block Market) by *Mohammad Ebadul Karim and his associates:*

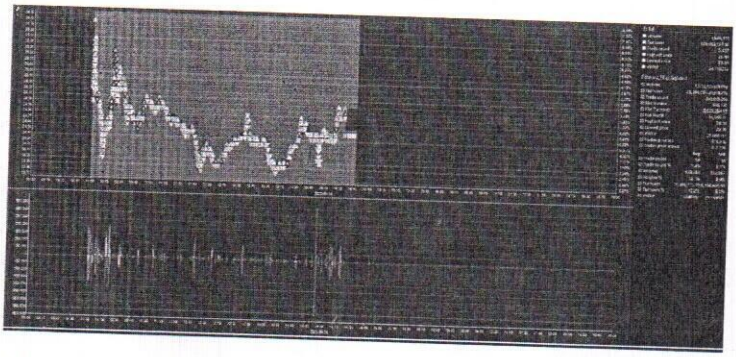
Opening balance: 11,454,064 shares

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Opening Balance										11454064	29.92	342675745.93						
19-09-2023	15000	19.07	286000.00	26000	19.77	513900.00	0	29.90	777483.27	11443064	29.90	342184262.66	3652066	20.30	2.01%	0.41%	0.71%	1.12%
20-09-2023	0	0.00	0.00	95000	21.85	2075731.20	0	29.90	2840804.26	11348064	29.90	339343458.40	2570773	22.30	9.85%	0.00%	3.70%	3.70%
21-09-2023	210846	24.45	5155725.40	672421	24.50	16474314.50	0	29.80	20040685.99	10886489	29.80	324458497.81	5555528	24.50	9.87%	3.80%	12.10%	15.90%
24-09-2023	678262	25.05	16989772.70	332067	25.16	8354488.60	0	29.52	9804249.38	11232684	29.52	331644021.13	5626418	24.50	0.00%	12.05%	5.90%	17.96%
25-09-2023	85000	26.22	2228500.00	810736	26.43	21428562.80	0	29.50	23916772.40	10506948	29.50	309955748.73	5920170	26.70	8.98%	1.44%	13.69%	15.13%
26-09-2023	461415	26.80	12367250.20	193018	26.99	5209958.40	0	29.39	5672144.57	10775345	29.39	316650854.36	3537167	26.90	0.75%	13.04%	5.46%	18.50%
27-09-2023	579000	27.04	15655471.90	205000	27.10	5554934.80	0	29.27	5999711.73	11149345	29.27	326306614.53	4718327	27.00	0.37%	12.27%	4.34%	16.62%
01-10-2023	590676	26.47	15637744.70	140676	26.24	3690887.20	0	29.13	4097383.19	11599345	29.13	337846976.05	6869560	26.70	-1.11%	8.60%	2.05%	10.65%
02-10-2023	400000	27.19	10875005.50	481659	28.28	13622136.80	0	29.06	13997854.13	11517686	29.06	334724127.42	4776730	28.10	5.24%	8.37%	10.08%	18.46%
03-10-2023	84500	28.22	2384650.00	70000	28.39	1987500.00	0	29.06	2033893.82	11532186	29.06	335074883.60	2643292	28.60	1.78%	3.20%	2.65%	5.84%
04-10-2023	290000	27.86	8079220.70	0	0.00	0.00	0	0.00	0.00	11822186	29.03	343154104.30	3883973	27.20	-4.90%	7.47%	0.00%	7.47%
08-10-2023	211499	25.40	5372333.60	0	0.00	0.00	0	0.00	0.00	12033685	28.96	348526437.90	1496489	24.60	-7.52%	14.13%	0.00%	14.13%
09-10-2023	13100	24.41	319760.00	12500	24.80	310000.00	0	28.96	361970.22	12034285	28.96	348484227.67	1001884	24.70	0.41%	1.31%	1.25%	2.56%
10-10-2023	0	0.00	0.00	30000	26.67	800189.20	0	28.96	868728.54	12004285	28.96	347615499.14	1423825	27.10	9.72%	0.00%	2.11%	2.11%
11-10-2023	13500	27.37	369550.00	508500	26.03	13236800.00	0	28.96	14724044.20	11509285	28.96	333261004.94	3134814	27.70	2.21%	0.43%	16.22%	16.65%
12-10-2023	238940	27.97	6682407.20	5000	28.30	141500.00	0	28.94	144678.63	11743225	28.94	339798733.51	2135820	28.10	1.44%	11.19%	0.23%	11.42%
15-10-2023	5000	28.60	143000.00	25000	28.86	721500.00	0	28.94	723389.56	11723225	28.94	339218343.95	2961977	29.00	3.20%	0.17%	0.84%	1.01%
16-10-2023	100000	31.90	3190000.00	50000	30.64	1532000.00	0	28.96	1448032.77	11773225	28.96	340960311.18	4099389	31.90	10.00%	2.44%	1.22%	3.66%
17-10-2023	290000	33.61	9746000.00	5000	33.80	169001.40	0	29.07	145361.75	12058225	29.07	350560949.43	4840819	34.40	7.84%	5.99%	0.10%	6.09%
19-10-2023	207000	35.09	7262629.90	5000	35.40	177000.00	0	29.17	145869.15	12260225	29.17	357677710.18	3633173	35.10	-0.57%	5.70%	0.14%	5.84%
22-10-2023	35000	33.71	1180000.00	0	0.00	0.00	0	0.00	0.00	12295225	29.19	358857710.18	2062029	34.30	-2.28%	1.70%	0.00%	1.70%
23-10-2023	110000	32.90	3618819.60	0	0.00	0.00	0	0.00	0.00	12405225	29.22	362476529.78	3524201	31.20	-9.04%	3.12%	0.00%	3.12%
25-10-2023	492821	31.20	15376911.50	0	0.00	0.00	0	0.00	0.00	12898046	29.30	377853441.28	1950564	31.30	0.32%	25.27%	0.00%	25.27%
26-10-2023	120000	30.61	3672730.00	0	0.00	0.00	0	0.00	0.00	13018046	29.31	381526171.28	1509967	30.50	-2.56%	7.95%	0.00%	7.95%
29-10-2023	98089	33.00	3236937.00	220000	30.31	6668000.00	0	29.34	6453721.60	12896135	29.34	378309386.68	1850160	33.50	9.84%	5.30%	11.89%	17.19%
30-10-2023	182300	35.77	6520286.20	45000	35.91	1616000.00	0	29.42	1324113.72	13033435	29.42	383505559.15	3201872	36.80	9.85%	5.69%	1.41%	7.10%
31-10-2023	583047	36.42	21237021.10	450100	34.04	15323540.00	0	29.72	13378979.63	13166382	29.72	391363600.62	4071774	37.20	1.09%	14.32%	11.05%	25.37%
01-11-2023	25000	36.46	911500.00	15000	36.68	550137.30	0	29.74	446058.38	13176382	29.74	391829042.24	1678562	36.60	-1.61%	1.49%	0.89%	2.38%
02-11-2023	0	0.00	0.00	10000	37.00	370000.00	0	29.74	297372.25	13166382	29.74	391531669.98	2154808	40.20	9.84%	0.00%	0.46%	0.46%
12-11-2023	0	0.00	0.00	49867	61.99	3091202.00	0	29.74	1482906.22	13116515	29.74	390048763.76	1694392	62.00	9.93%	0.00%	2.94%	2.94%
Total	**6119995**	**29.17**	**178499227.20**	**4457544**	**27.73**	**123619284.20**	**0**	29.42	**131126209.37**	**13116515**	**29.74**	**390048763.76**						

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department of DSE, it is found that *Mohammad Ebadul Karim and his associates* were involved in trading of shares of 'KBPPWBIL' which influenced to uplift the price of the said securities on several dates:

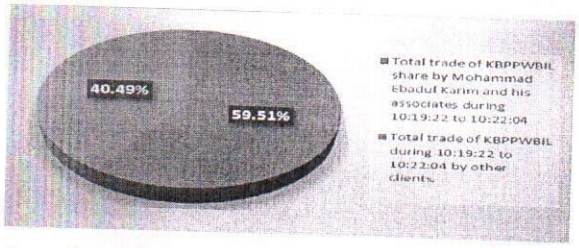
1205590075153283,1203710043493921,1205590043493921,1601880075153283,1203710064190682,1203710073922456,1205590054811592,1203710046187231,1601880046187231,1601880043377493 (Combined)

17-10-2023

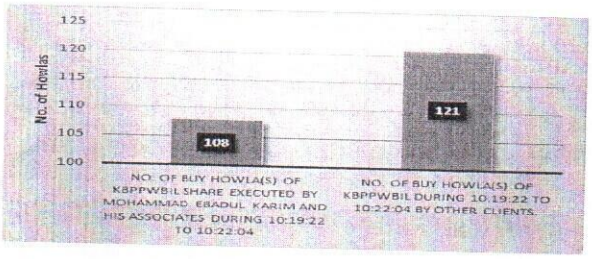


It was observed in the above graph that on 24-09-2023, total number of trades of KBPPWBIL in the market was 3457, whereas number of trades (buy) executed by *Mohammad Ebadul Karim and his associates* were 256 which is approximately 7.41% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 5,626,418 whereas buy volume by the said client(s) was 678,262 which is approximately 12.05% of the total traded volume in the market.

On 24-09-2023, trading of KBPPWBIL share was started at Tk. 25.50 which is Tk. 1.00 more than the YCP of Tk. 24.50. On that day, *Mohammad Ebadul Karim and his associates* started series of trading at 10:19:22 at price Tk. 24.90 and induced the same to rise to Tk. 25.90 up to 10:22:04. It can also be observed from the above graph that *Mohammad Ebadul Karim and his associates* executed significant trades during this time period. It is mentionable here that from 10:19:22 to 10:22:04, *Mohammad Ebadul Karim and his associates* bought 312,925 shares of KBPPWBIL compared to the total traded share of 525,861. This is shown in the following Pie Chart.

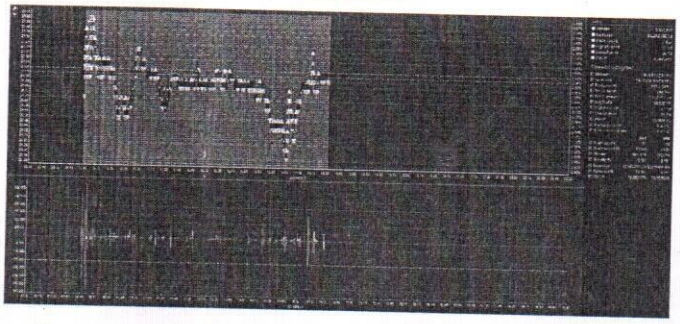


It is also found that during the aforementioned period, *Mohammad Ebadul Karim and his associates* executed 108 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 229 as shown in the following Bar Chart.



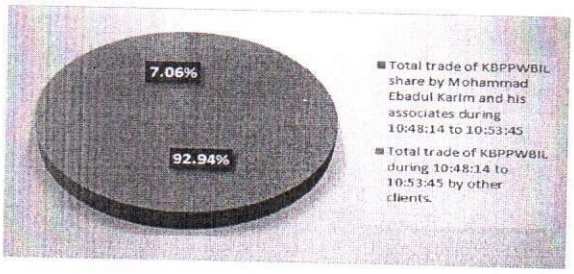
It is observed from the above graphs and screenshot that *Mohammad Ebadul Karim and his associates* bought 59.51% of the total trades of KBPPWBIL shares by executing 108 of total 229 howlas from 10:19:22 to 10:22:04 on 24-09-2023. From 10:19:22 to 10:22:04, *Mohammad Ebadul Karim and his associates* induced the price to rise from Tk. 24.90 to Tk. 25.90. Thus it seems that *Mohammad Ebadul Karim and his associates* were actively trying to lift the price of KBPPWBIL share.

<u>26-09-2023</u>

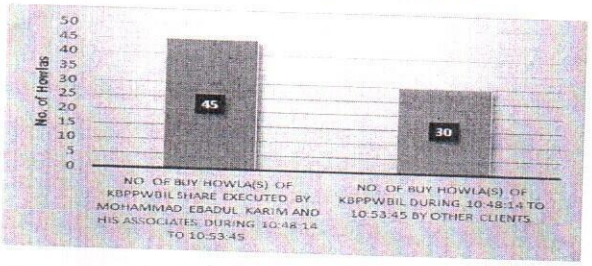


It was observed in the above graph that on 26-09-2023, total number of trades of KBPPWBIL in the market was 2162, whereas number of trades (buy) executed by *Mohammad Ebadul Karim and his associates* were 251 which is approximately 11.61% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 3,537,167 whereas buy volume by the said client(s) was 461,415 which is approximately 13.04% of the total traded volume in the market.

On 26-09-2023, trading of KBPPWBIL share was started at Tk. 26.70 which is similar to the YCP of Tk. 26.70. On that day, *Mohammad Ebadul Karim and his associates* started series of trading at 10:48:14 at price Tk. 26.60 and induced the same to rise to Tk. 27.00 up to 10:53:45. It can also be observed from the above graph that *Mohammad Ebadul Karim and his associates* executed significant trades during this time period. It is mentionable here that from 10:48:14 to 10:53:45, *Mohammad Ebadul Karim and his associates* bought 82,188 shares of KBPPWBIL compared to the total traded share of 88,430. This is shown in the following Pie Chart.

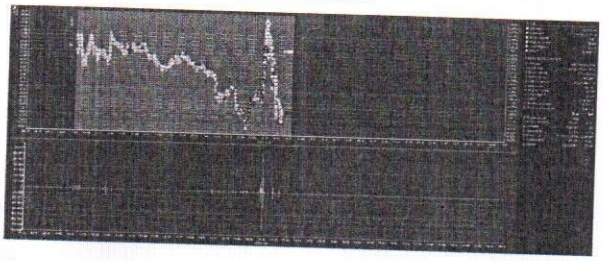


It is also found that during the aforementioned period, *Mohammad Ebadul Karim and his associates* executed 45 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 75 as shown in the following Bar Chart.



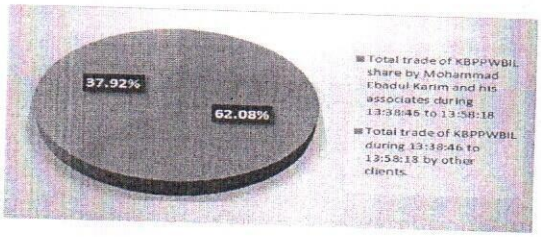
It is observed from the above graphs and screenshot that *Mohammad Ebadul Karim and his associates* bought 92.94% of the total trades of KBPPWBIL shares by executing 45 of total 75 howlas from 10:48:14 to 10:53:45 on 26-09-2023. From 10:48:14 to 10:53:45, *Mohammad Ebadul Karim and his associates* induced the price to rise from Tk. 26.60 to Tk. 27.00. Thus it seems that *Mohammad Ebadul Karim and his associates* were actively trying to lift the price of KBPPWBIL share.

31-10-2023

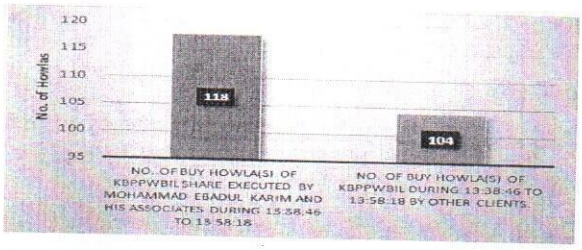


It was observed in the above graph that on 31-10-2023, total number of trades of KBPPWBIL in the market was 1981, whereas number of trades (buy) executed by *Mohammad Ebadul Karim and his associates* were 202 which is approximately 10.20% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 3,621,774 whereas buy volume by the said client(s) was 583,047 which is approximately 16.10% of the total traded volume in the market.

On 31-10-2023, trading of KBPPWBIL share was started at Tk. 37.50 which is Tk. 0.70 more than the YCP of Tk. 36.80. On that day, *Mohammad Ebadul Karim and his associates* started series of trading at 13:38:46 at price Tk. 35.20 and induced the same to rise to Tk. 37.30 up to 13:58:18. It can also be observed from the above graph that *Mohammad Ebadul Karim and his associates* executed significant trades during this time period. It is mentionable here that from 13:38:46 to 13:58:18, *Mohammad Ebadul Karim and his associates* bought 372,356 shares of KBPPWBIL compared to the total traded share of 599,838. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Mohammad Ebadul Karim and his associates* executed 118 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 222 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that *Mohammad Ebadul Karim and his associates* bought 62.08% of the total trades of KBPPWBIL shares by executing 118 of total 222 howlas from 13:38:46 to 13:58:18 on 31-10-2023. From 13:38:46 to 13:58:18, *Mohammad Ebadul Karim and his associates* induced the price to rise from Tk. 35.20 to Tk. 37.30. Thus it seems that *Mohammad Ebadul Karim and his associates* were actively trying to lift the price of KBPPWBIL share.

c) **Gain and Loss by *Mohammad Ebadul Karim and his associates* from 19.09.2023 to 12.11.2023:**

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
0	0.00	0.00	1150000	29.84	34320000.00	6119995	29.17	178499227.20	4457544	27.73	123619284.20	29.42	131126209.37	13116515	29.74	390048763.76

Realized Capital gain(loss)per unit	-1.68	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	-5.72%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	-75,06,925.17	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (12-11-2023)	62.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	32.26	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	108.49%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	42,31,75,166.24	Quantity of Stock Positon x Unrealized gain (loss) per unit

Client Total	1,05,77,539
Total Vol. of period	11,62,93,139
Percentage	9.10%

As per DSE trade data, *Mohammad Ebadul Karim and his associates* bought 6,119,995 shares from public market and sold 4,457,544 shares of 'KBPPWBIL' in both public and block market during the period from 19.09.2023 to 12.11.2023. In the investigation period, *Mohammad Ebadul Karim and his associates* traded 9.10% shares of 'KBPPWBIL' and realized a capital loss of Tk. 7,506,925.17. It is also mentionable that he had unrealized gain of Tk. 423,175,166.24.

Findings:

As per **section 17 of the Securities and Exchange Ordinance, 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 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 the 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 Ebadul Karim and his associates* were involved directly and indirectly in a series of transactions of shares of 'KBPPWBIL' with the aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

Contraventions:

Mohammad Ebadul Karim and his associates have violated the following:

- **Section 17(e)(v) of the Securities and Exchange Ordinance, 1969** by directly and indirectly effecting a series of transactions of shares of 'KBPPWBIL' creating the appearance of active trading therein and raising price of the said share.

Observation-2:

It is also observed that during the investigation period *Mohammad Ebadul Karim and his associates* executed trade of KBPPWBIL share within themselves which created a false and misleading appearance of active trading of this security. As a result, 110,646 shares of KBPPWBIL were executed in 15 howla(s) where the related account holders acted as both buyer and seller as shown below:

TRADEDATE	TRADETIME	INSTRUMENTCODE	TRADEVOLUME	BUYERCODE	BOIDBUYER	SELLERCODE	BOIDSELLER	MARKETTYPE
24/09/2023	10:19:22	KBPPWBIL	5000	DSEUBR	1205590054811592	DSEABF	1203710046187231	Public
24/09/2023	10:21:58	KBPPWBIL	10000	DSEUBR	1205590075153283	DSEABF	1203710046187231	Public
24/09/2023	10:23:39	KBPPWBIL	12000	DSEABF	1203710073922456	DSEUBR	1205590054811592	Public
24/09/2023	10:23:39	KBPPWBIL	12000	DSEABF	1203710073922456	DSEUBR	1205590054811592	Public
24/09/2023	10:23:39	KBPPWBIL	12000	DSEABF	1203710073922456	DSEUBR	1205590054811592	Public
24/09/2023	10:23:39	KBPPWBIL	8846	DSEABF	1203710073922456	DSEUBR	1205590054811592	Public
27/09/2023	12:31:02	KBPPWBIL	10000	DSEABF	1203710046187231	DSEABF	1203710064190682	Public
27/09/2023	12:31:11	KBPPWBIL	5360	DSEABF	1203710043493921	DSEABF	1203710064190682	Public
01/10/2023	13:53:09	KBPPWBIL	5000	DSEABF	1203710064190682	DSEABF	1203710046187231	Public
01/10/2023	13:53:39	KBPPWBIL	10000	DSEABF	1203710064190682	DSEABF	1203710046187231	Public
01/10/2023	14:16:39	KBPPWBIL	10000	DSEABF	1203710064190682	DSEABF	1203710046187231	Public
01/10/2023	14:17:41	KBPPWBIL	5000	DSEABF	1203710064190682	DSEABF	1203710046187231	Public
02/10/2023	13:54:43	KBPPWBIL	5000	DSEUBR	1205590075153283	DSEABF	1203710046187231	Public
17/10/2023	10:12:51	KBPPWBIL	340	DSEABF	1203710064190682	DSEABF	1203710046187231	Public
31/10/2023	13:34:00	KBPPWBIL	100	DSEABF	1203710046187231	DSEUBR	1205590054811592	Public

Summary			
Buyer (BOID)	Seller (BOID)	Matched Quantity	Market
1205590054811592 (Beacon Developments Limited)	1203710046187231 (Mohammad Ebadul Karim)	5,000	Public
1205590075153283 (Risana Karim & Ehtiaz Karim)	1203710046187231 (Mohammad Ebadul Karim)	15,000	
1203710043493921 (Risana Karim)	1203710064190682 (Beacon Medicare Ltd.)	5,360	
1203710046187231 (Mohammad Ebadul Karim)	1203710064190682 (Beacon Medicare Ltd.)	10,000	
1203710046187231 (Mohammad Ebadul Karim)	1205590054811592 (Beacon Developments Limited)	100	
1203710064190682 (Beacon Medicare Ltd.)	1203710046187231 (Mohammad Ebadul Karim)	30,340	
1203710073922456 (Beacon Medicare Ltd. Empl's CPF)	1205590054811592 (Beacon Developments Limited)	44,846	
Total		110,646	

Findings:

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 operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

.....

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

Whereas, it has been found that during the investigation period *Mohammad Ebadul Karim* (BOID # 1203710046187231) and his above mentioned associates exchanged 110,646 shares of KBPPWBIL with one another. Therefore, such trading of KBPPWBIL shares created a false and misleading appearance of active trading of this security.

Contravention(s):

Mohammad Ebadul Karim (BOID # 1203710046187231), *Beacon Developments Limited* (BOID # 1205590054811592), *Risana Karim & Ehtiaz Karim* (BOID # 1205590075153283), *Risana Karim* (BOID # 1203710043493921), *Beacon Medicare Ltd.* (BOID # 1203710064190682) and *Beacon Medicare Ltd. Empl's CPF* (BOID # 1203710073922456) have violated **Section 17(e)(ii) of the Securities and Exchange Ordinance, 1969** for executing trade of KBPPWBIL share by creating false and misleading appearance of active trading in that security.

Observation-3:

As per instrument ledger, portfolio statements and DSE trade data of *Mohammad Ebadul Karim* (BOID # 1203710046187231) *and his associates* acquired more than 10% shares of 'KBPPWBIL' on several date(s). Details are given below:

Table: Substantial (above 10%) Shareholding of KBPPWBIL *by Mohammad Ebadul Karim and his associates* as per DSE trade data

Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	18-09-2023		19-09-2023		20-09-2023		21-09-2023		24-09-2023		25-09-2023		26-09-2023		27-09-2023		01-10-202	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Perc
1	Risana Karim & Ehtiaz Karim	1205590075153283	11788	UCB Stock Brokerage Limited	2696672	2.75%	2696672	2.75%	2696672	2.75%	2265097	2.31%	2621292	2.67%	2066618	2.11%	2318455	2.36%	2663455	2.72%	2663455	2.
2	Risana Karim	1203710043493921	3214	AB Securities Limited	106663	0.11%	106663	0.11%	96663	0.10%	86663	0.09%	86663	0.09%	15000	0.02%	20000	0.02%	20000	0.02%	65000	0.0
3	Risana Karim	1205590043493921	11755	UCB Stock Brokerage Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.0
4	Risana Karim & Ehtiaz Karim	1601880075153283	10114	MTB Securities Limited	3544061	3.61%	3544061	3.61%	3544061	3.61%	3544061	3.61%	3544061	3.61%	3544061	3.61%	3496061	3.56%	3496061	3.56%	3496061	3.5
5	Beacon Medicare Ltd.	1203710064190682	5058	AB Securities Limited	2616879	2.67%	2616879	2.67%	2616879	2.67%	2616879	2.67%	2616879	2.67%	2666879	2.72%	2716879	2.77%	2760879	2.81%	3200879	3.2
6	Beacon Medicare Ltd. Empl's CPF	1203710073922456	5565	AB Securities Limited	100000	0.10%	100000	0.10%	100000	0.10%	100000	0.10%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.1
7	Beacon Developments Limited	1205590054811592	11680	UCB Stock Brokerage Limited	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.0
8	Mohammad Ebadul Karim	1203710046187231	3371	AB Securities Limited	1251675	1.28%	1240675	1.26%	1155675	1.18%	1135675	1.16%	1065675	1.09%	916276	0.93%	925836	0.94%	910836	0.93%	875836	0.8
9	Mohammad Ebadul Karim	1601880046187231	10310	MTB Securities Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.0
10	Md. Sohel Alam	1601880043377493	23176	MTB Securities Limited	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.0
	Total				11454064	11.68%	11443064	11.67%	11348064	11.57%	10886489	11.10%	11232684	11.45%	10506948	10.71%	10775345	10.99%	11149345	11.37%	11599345	11.8
Total No. of Outstanding Securities		98,079,877.00			98,079,877	11.68%		11.67%		11.57%		11.10%		11.45%		10.71%		10.99%		11.37%		11.8

Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	02-10-2023		03-10-2023		04-10-2023		05-10-2023		08-10-2023		09-10-2023		10-10-2023		11-10-2023	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percent
1	Risana Karim & Ehtiaz Karim	1205590075153283	11788	UCB Stock Brokerage Limited	2596796	2.65%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73
2	Risana Karim	1203710043493921	3214	AB Securities Limited	55000	0.06%	0	0.00%	35000	0.04%	35000	0.04%	70000	0.07%	70000	0.07%	40000	0.04%	40000	0.04
3	Risana Karim	1205590043493921	11755	UCB Stock Brokerage Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00
4	Risana Karim & Ehtiaz Karim	1601880075153283	10114	MTB Securities Limited	3496061	3.56%	3496061	3.56%	3496061	3.56%	3496061	3.56%	3496061	3.56%	3496061	3.56%	3496061	3.56%	3496061	3.56
5	Beacon Medicare Ltd.	1203710064190682	5058	AB Securities Limited	3200879	3.26%	3200879	3.26%	3385879	3.45%	3385879	3.45%	3522378	3.59%	3522978	3.59%	3522978	3.59%	3022978	3.08
6	Beacon Medicare Ltd. Empl's CPF	1203710073922456	5565	AB Securities Limited	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16
7	Beacon Developments Limited	1205590054811592	11680	UCB Stock Brokerage Limited	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09
8	Mohammad Ebadul Karim	1203710046187231	3371	AB Securities Limited	870836	0.89%	860836	0.88%	930836	0.95%	930836	0.95%	970836	0.99%	970836	0.99%	970836	0.99%	975836	0.99
9	Mohammad Ebadul Karim	1601880046187231	10310	MTB Securities Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00
10	Md. Sohel Alam	1601880043377493	23176	MTB Securities Limited	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07
	Total				11599345	11.74%	11532186	11.76%	11822186	12.05%	11822186	12.05%	12033685	12.27%	12034285	12.27%	12004285	12.24%	11509285	11.73
Total No. of Outstanding Securities		98,079,877.00				11.74%		11.76%		12.05%		12.05%		12.27%		12.27%		12.24%		11.73

Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	12-10-2023		15-10-2023		16-10-2023		17-10-2023		18-10-2023		19-10-2023		22-10-2023		23-10-2023		25-10-2023	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage
1	Risana Karim & Ehtiaz Karim	1205590075153283	11788	UCB Stock Brokerage Limited	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%	2676296	2.73%
2	Risana Karim	1203710043493921	3214	AB Securities Limited	45000	0.05%	25000	0.03%	5000	0.01%	5000	0.01%	5000	0.01%	0	0.00%	15000	0.02%	40000	0.04%	65000	0.07%
3	Risana Karim	1205590043493921	11755	UCB Stock Brokerage Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
4	Risana Karim & Ehtiaz Karim	1601880075153283	10114	MTB Securities Limited	3496061	3.56%	3496061	3.56%	3496061	3.56%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%
5	Beacon Medicare Ltd.	1203710064190682	5058	AB Securities Limited	3211918	3.27%	3211918	3.27%	3311918	3.38%	3511918	3.58%	3511918	3.58%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%
6	Beacon Medicare Ltd. Empl's CPF	1203710073922456	5565	AB Securities Limited	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%
7	Beacon Developments Limited	1205590054811592	11680	UCB Stock Brokerage Limited	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%	1066417	1.09%
8	Mohammad Ebadul Karim	1203710046187231	3371	AB Securities Limited	1015836	1.04%	1015836	1.04%	985836	1.01%	980836	1.00%	980836	1.00%	1105836	1.13%	1125836	1.15%	1170836	1.19%	1333187	1.36%
9	Mohammad Ebadul Karim	1601880046187231	10310	MTB Securities Limited	0	0.00%	0	0.00%	0	0.00%	40000	0.04%	40000	0.04%	40000	0.04%	40000	0.04%	40000	0.04%	345470	0.35%
10	Md. Sohel Alam	1601880043377493	23176	MTB Securities Limited	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	71697	0.07%	111697	0.11%	111697	0.11%
	Total				11743225	11.97%	11723225	11.95%	11773225	12.00%	12058225	12.29%	12058225	12.29%	12260225	12.50%	12295225	12.54%	12405225	12.65%	12898046	13.15%
Total No. of Outstanding Securities		98,079,877.00				11.97%		11.95%		12.00%		12.29%		12.29%		12.50%		12.54%		12.65%		13.15%

Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	26-10-2023		29-10-2023		30-10-2023		31-10-2023		01-11-2023		02-11-2023		05-11-2023		06-11-2023		07-11-2023		08-11-2023		09-11-2023		12-11-2023	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percenta
1	Risana Karim & Ehtiaz Karim	1205590075153283	11788	UCB Stock Brokerage Limited	2676296	2.73%	2576296	2.63%	2576296	2.63%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%	2623943	2.68%
2	Risana Karim	1203710043493921	3214	AB Securities Limited	65000	0.07%	45000	0.05%	15000	0.02%	25000	0.03%	10000	0.01%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
3	Risana Karim	1205590043493921	11755	UCB Stock Brokerage Limited	0	0.00%	0	0.00%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%	83300	0.08%
4	Risana Karim & Ehtiaz Karim	1601880075153283	10114	MTB Securities Limited	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%	3546061	3.62%
5	Beacon Medicare Ltd.	1203710064390682	5058	AB Securities Limited	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3593918	3.66%	3544051	3.61%
6	Beacon Medicare Ltd. Empl's CPF	1203710073922456	5565	AB Securities Limited	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%	160000	0.16%
7	Beacon Developments Limited	1205590054811592	11680	UCB Stock Brokerage Limited	1066417	1.09%	966417	0.99%	1050417	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%	1050317	1.07%
8	Mohammad Ebadul Karim	1203710046187231	3371	AB Securities Limited	1453187	1.48%	1551276	1.58%	1551276	1.58%	1626676	1.66%	1651676	1.68%	1651676	1.68%	1651676	1.68%	1651676	1.68%	1651676	1.68%	1651676	1.68%	1651676	1.68%	1651676	1.68%
9	Mohammad Ebadul Karim	1601880046187231	10310	MTB Securities Limited	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%	345470	0.35%
10	Md. Sohel Alam	1601880043377493	23176	MTB Securities Limited	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%	111697	0.11%
Total					13018046	13.27%	12896135	13.15%	13033435	13.29%	13166382	13.42%	13176382	13.43%	13166382	13.42%	13166382	13.42%	13166382	13.42%	13166382	13.42%	13166382	13.42%	13166382	13.42%	13116515	13.37%
Total No. of Outstanding Securities				98,079,877.00		13.27%		13.15%		13.29%		13.42%		13.43%		13.42%		13.42%		13.42%		13.42%		13.42%		13.42%		13.37%

From the above table, it is observed that *Mohammad Ebadul Karim and his associates* were holding more than 10% of the total paid up shares of 'KBPPWBIL' on several date(s). It is mentionable that the above clients did not submit any declaration to the Exchange to buy more than 10% shares of 'KBPPWBIL' which specifically violates **বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮।**

Findings:

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 পরিপন্থী কোন কিছু না থাকিলে, এই বিধিমালায়, (ক) "অধিগ্রহণকারী" 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 জন্য প্রস্তাব করে....."*

And as per **বিধি ৪(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 যাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিবর্গ, 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।"*

Whereas, it is found that *Mohammad Ebadul Karim and his associates* acquired more than 10% shares of 'KBPPWBIL' on several date(s) without submitting any declaration to the Exchange.

Contravention(s):

Mohammad Ebadul Karim and his associates have violated the following:

- **বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮** by acquiring more than 10% shares of 'KBPPWBIL' without declaration.

B. Individual Gain/Loss calculations:

I. Trading of *Beacon Medicare Ltd.*:

a) Individual trade pattern of *Beacon Medicare Ltd.* in public market:

Date	Code # 5058				Total					
	BO ID # 1203710064190682									
	Beacon Medicare Ltd.									
	AB Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
25-09-2023	50000	26.60	0	0.00	50000	26.60	1330000.00	0	0.00	0.00
26-09-2023	50000	26.80	0	0.00	50000	26.80	1340000.00	0	0.00	0.00
27-09-2023	184000	27.04	140000	26.99	184000	27.04	4976139.20	140000	26.99	3777920.00
01-10-2023	440000	26.70	0	0.00	440000	26.70	11749643.10	0	0.00	0.00
04-10-2023	185000	28.11	0	0.00	185000	28.11	5200720.70	0	0.00	0.00
08-10-2023	136499	25.41	0	0.00	136499	25.41	3467833.60	0	0.00	0.00
09-10-2023	600	24.60	0	0.00	600	24.60	14760.00	0	0.00	0.00
12-10-2023	188940	28.00	0	0.00	188940	28.00	5289907.20	0	0.00	0.00
16-10-2023	100000	31.90	0	0.00	100000	31.90	3190000.00	0	0.00	0.00
17-10-2023	200000	33.85	0	0.00	200000	33.85	6770000.00	0	0.00	0.00
19-10-2023	82000	35.40	0	0.00	82000	35.40	2902800.00	0	0.00	0.00
12-11-2023	0	0.00	49867	61.99	0	0.00	0.00	49867	61.99	3091202.00
Total	1617039		189867		1617039			189867		

b) Effects of 'KBPPWBIL' at DSE (both Public Market and Block Market) by *Beacon Medicare Ltd.*:

Opening balance: 2,616,879 shares

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Opening Balance										2616879	29.35	76794233.07						
25-09-2023	50000	26.60	1330000.00	0	0.00	0.00	0	0.00	0.00	2666879	29.29	78124233.07	5920170	26.70	8.98%	0.84%	0.00%	0.84%
26-09-2023	50000	26.80	1340000.00	0	0.00	0.00	0	0.00	0.00	2716879	29.25	79464233.07	3537167	26.90	0.75%	1.41%	0.00%	1.41%
27-09-2023	184000	27.04	4976139.20	140000	26.99	3777920.00	0	29.11	4075196.56	2760879	29.11	80365175.71	4718327	27.00	0.37%	3.90%	2.97%	6.87%
01-10-2023	440000	26.70	11749643.10	0	0.00	0.00	0	0.00	0.00	3200879	28.78	92114818.81	6869560	26.70	-1.11%	6.41%	0.00%	6.41%
04-10-2023	185000	28.11	5200720.70	0	0.00	0.00	0	0.00	0.00	3385879	28.74	97315539.51	3883973	27.20	-4.90%	4.76%	0.00%	4.76%
08-10-2023	136499	25.41	3467833.60	0	0.00	0.00	0	0.00	0.00	3522378	28.61	100783373.11	1496489	24.60	-7.52%	9.12%	0.00%	9.12%
09-10-2023	600	24.60	14760.00	0	0.00	0.00	0	0.00	0.00	3522978	28.61	100798133.11	1001884	24.70	0.41%	0.06%	0.00%	0.06%
11-10-2023	0	0.00	0.00	500000	26.00	13000000.00	0	28.61	14305813.59	3022978	28.61	86492319.52	3134814	27.70	2.21%	0.00%	15.95%	15.95%
12-10-2023	188940	28.00	5289907.20	0	0.00	0.00	0	0.00	0.00	3211918	28.58	91782226.72	2135820	28.10	1.44%	8.85%	0.00%	8.85%
16-10-2023	100000	31.90	3190000.00	0	0.00	0.00	0	0.00	0.00	3311918	28.68	94972226.72	4099389	31.90	10.00%	2.44%	0.00%	2.44%
17-10-2023	200000	33.85	6770000.00	0	0.00	0.00	0	0.00	0.00	3511918	28.97	101742226.72	4840819	34.40	7.84%	4.13%	0.00%	4.13%
19-10-2023	82000	35.40	2902800.00	0	0.00	0.00	0	0.00	0.00	3593918	29.12	104645026.72	3633173	35.10	-0.57%	2.26%	0.00%	2.26%
12-11-2023	0	0.00	0.00	49867	61.99	3091202.00	0	29.12	1451990.15	3544051	29.12	103193036.57	1694392	62.00	9.93%	0.00%	2.94%	2.94%
Total	1617039	28.59	46231803.80	689867	28.80	19869122.00	0	28.75	19833000.30	3544051	29.12	103193036.57						

c) Gain and Loss by *Beacon Medicare Ltd. 19.09.2023 to 12.11.2023*:

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
0	0.00	0.00	500000	26.00	13000000.00	1617039	28.59	46231803.80	689867	28.80	19869122.00	28.75	19833000.30	3544051	29.12	103193036.57

Realized Capital gain(loss)per unit	0.05	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	0.18%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	36,121.70	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (12-11-2023)	62.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	32.88	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	112.93%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	11,65,38,125.43	Quantity of Stock Positon x Unrealized gain (loss) per unit

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক ফেব্রুয়ারি ১২, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭/২০২৩/১৪৭ স্মারকমূলে Mohammad Ebadul Karim and his associates (Mr. Mohammad Ebadul Karim, Ms. Risana Karim, Beacon Medicare Ltd., Beacon Medicare Ltd. Employees CPF, Beacon Developments Limited and Md. Sohel Alam)-কে ফেব্রুয়ারি ২৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে নির্ধারিত তারিখে শুনানীতে Beacon Medicare Ltd. এর পক্ষে Mr. Md. Mohibur Rahman (on behalf) উপস্থিত হয়ে ফেব্রুয়ারি ২৯, ২০২৪ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With reference to your letter No. BSEC/Enforcement/3477/2023/142 BSEC/Enforcement/3477/2023/147, Dated 12 February 2024 on the above subject, I like to inform that, I have been maintaining a Beneficial Owner account bearing No. 1203710064190682 maintaining with AB Securities Limited. As per Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 the series of transactions of shares and trade of shares by creating false and misleading appearance while trading in that security and as per sub rules (০১) (ক) and rules ০৪ (০১) any associates collectively bold more than 10% shares without declaration are strictly prohibited. But unfortunately, we have made few transactions without knowing the restrictions of the law from the period of 05 March 2023 to 13 July 2023 and 19 September 2023 to 12 November 2023. we do hereby inform that except those incidents we have been complying all the laws, rules and regulations of BSEC on the above-mentioned period.

So, you are therefore requested to consider this issue as very generously and we like to assure you that we will comply all the laws, rules and regulations of BSEC in future."

যেহেতু, Beacon Medicare Ltd.-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমুহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্থ হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Beacon Medicare Ltd.-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Beacon Medicare Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii), Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Beacon Medicare Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Beacon Medicare Ltd.-কে জরিমানা করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত ক্ষমতাবলে-

- Beacon Medicare Ltd.-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা; Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ৫.০০ (পাঁচ) লক্ষ টাকা এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা **[মোট ৭.০০ (সাত) লক্ষ টাকা]** অর্থদন্ড ধার্য্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

২৯/০৬/২০২৫

মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। **Beacon Medicare Ltd.**
(BOID: 1203710064190682)
9/A, Toyenbee Circular Road
Motijheel C/A, Dhaka-1000.