

Bangladesh Securities and Exchange Commission
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Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৯২
তারিখঃ জানুয়ারি ৩০, ২০২৫

Beacon Pharmaceuticals Ltd-EPF
(BO ID # 1001880004821881)
Beacon Business centre,
9/A, Tayenbee circular Road
motijheel C/A, Dhaka- 1000

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৯১ তারিখঃ জানুয়ারি ৩০, ২০২৫ এর সত্যায়িত অনুলিপি
আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


৩০/০১/২০২৫

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/MSI/2003-0170]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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তারিখঃ জানুয়ারি ৩০, 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, অক্টোবর ১২, ২০২২ তারিখের কমিশনের পত্র নং BSEC/MSI/2003-0170/134 অনুযায়ী ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ২১.০৬.২০২২ থেকে ১২.১০.২০২২ পর্যন্ত সময়ে Orion Infusion Limited (ORIONINFU)-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:

A. Top Traders:

I. Major buyers of the period (Both Public and Block Market):

The price of ORIONINFU shares was increased by Tk. 80.40 to Tk. 839.20 which was increased by 1043.78% from 21.06.2022 to 12.10.2022. Major buyers of the period were as follows (as per DSE trade data):

Sl. No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	23176	Md.Sohel Alam	1601880043377493	MTB Securities Limited	3817677	2839973	6657650	68371890	9.74%
2	3371	Mohammad Ebadul Karim	1203710046187231	AB Securities Limited	2805154	2625762	5430916	68371890	7.94%
3	9726	Mohammad Ekhlaur Rahman	1601880069342424	MTB Securities Limited	2362338	2111981	4474319	68371890	6.54%
4	5058	Beacon Medicare Ltd.	1203710064190682	AB Securities Limited	1296393	1028022	2324415	68371890	3.40%
5	026	Abil - Mda	1601760000002612	AB Investment Limited	1028000	897000	1925000	68371890	2.82%
6	3214	Risana Karim	1203710043493921	AB Securities Limited	1024806	930793	1955599	68371890	2.86%
7	11776	Md. Azad Hossain Patwary	1205590068957657	JCB Stock Brokerage Limited	764065	661581	1425646	68371890	2.09%
8	11771	Md. Akter Hosen	1205590068957614	JCB Stock Brokerage Limited	686150	532596	1219046	68371890	1.78%
9	11755	Risana Karim	1205590043493921	JCB Stock Brokerage Limited	564426	533947	1098373	68371890	1.61%
10	D3386	Md. Jashim Mizi	1204780074143621	United Securities Limited	557200	15671	572871	68371890	0.84%
11	J3632	Md. Abul Kashem	1605400075149491	Janata Capital and Investment Ltd	516217	240	516457	68371890	0.76%
12	J3635	Farid Hossain	1605400075149797	Janata Capital and Investment Ltd	512410	468	512878	68371890	0.75%
13	J3636	Md. Rafiqul Islam	1605400075149901	Janata Capital and Investment Ltd	499900	270	500170	68371890	0.73%
14	9238	Tahsin Al Mueed Zaman	1601880073521315	MTB Securities Limited	475394	390619	866013	68371890	1.27%
15	D3397	Md. Mahfuzur Rahman	1204780074251631	United Securities Limited	451200	0	451200	68371890	0.66%

Findings:

- After analyzing documents, it is observed that Mr. Md. Sohel Alam (Client code # 23176 of MTB Securities Limited) was the top buyer of "ORIONINFU" share from 21.06.2022 to 12.10.2022. The said client bought 3,817,677 and sold 2,839,973 shares which is 9.74% of total traded share of "ORIONINFU" during the period. It was observed that the aforesaid client was involved with the following accounts through which they traded shares of "ORIONINFU" during the investigation period.

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BO ID	Client Code	Client Name	Name of TREC Holder
1601880043377493	23176	MD. SOHEL ALAM	MTB Securities Limited
1203710046187231	3371	MOHAMMAD EBADUL KARIM	AB Securities Limited
1601880046187231	10310	MOHAMMAD EBADUL KARIM	MTB Securities Limited
1203710043493921	3214	RISANA KARIM	AB Securities Limited
1205590043493921	11755	RISANA KARIM	UCB Stock Brokerage Limited
1205590075153283	11788	RISANA KARIM	UCB Stock Brokerage Limited
1203710064190682	5058	BEACON MEDICARE LTD.	AB Securities Limited
1605170064190682	CM489	BEACON MEDICARE LTD.	City Bank Capital Resources Limited
1601880064821881	22936	BEACON PHARMACEUTICALS LTD-EPF	MTB Securities Limited
1601880065365037	22985	BEACON PHARMACEUTICALS LTD-EGF	MTB Securities Limited
1203710048667734	7053	Beacon Pharmaceuticals Ltd.	AB Securities Limited
1203710075253110	5674	NURUNNAHAR KARIM	AB Securities Limited

II. Major sellers of the period (Both Public and Block Market):

The list of major sellers of ORIONINFU shares from 21.06.2022 to 12.10.2022 are as follows (as per surveillance data):

Sl. No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	23176	Md. Sohel Alam	1601880043377493	MTB Securities Limited	3817677	2839973	6657650	68371890	9.74%
2	3371	Mohammad Ebadul Karim	1203710046187231	AB Securities Limited	2805154	2625762	5430916	68371890	7.94%
3	9726	Mohammad Ekhlasur Rahman	1601880069342424	MTB Securities Limited	2362338	2111981	4474319	68371890	6.54%
4	JCIL	Janata Capital & Invest. Ltd.	1201530034513871	ICB Securities Trading Company Limited	73553	1101439	1174992	68371890	1.72%
5	5058	Beacon Medicare Ltd.	1203710064190682	AB Securities Limited	1296393	1028022	2324415	68371890	3.40%
6	3214	Risana Karim	1203710043493921	AB Securities Limited	1024806	930793	1955599	68371890	2.86%
7	026	Abil - Mda	1601760000002612	AB Investment Limited	1028000	897000	1925000	68371890	2.82%
8	RAJ3382	Mst. Israt Jahan	1203100070177244	ICB Securities Trading Co. Ltd.	0	868500	868500	68371890	1.27%
9	11776	Md. Azad Hossain Patwary	1205590068957657	UCB Stock Brokerage Limited	764065	661581	1425646	68371890	2.09%
10	11755	Risana Karim	1205590043493921	UCB Stock Brokerage Limited	564426	533947	1098373	68371890	1.61%
11	11771	Md. Akter Hosen	1205590068957614	UCB Stock Brokerage Limited	686450	532596	1219046	68371890	1.78%
12	9196	Md. Rasel Mia	1601880073433251	MTB Securities Limited	424118	399118	823236	68371890	1.20%
13	10310	Mohammad Ebadul Karim	1601880046187231	MTB Securities Limited	423618	394774	818392	68371890	1.20%
14	9238	Tahsin Al Mueed Zaman	1601880073521315	MTB Securities Limited	475394	390619	866013	68371890	1.27%
15	13965	Bipul Mia	1204490073749364	Bank Asia Securities Limited	388905	388611	777516	68371890	1.14%

Findings:

- After analyzing documents, it is observed that Mr. Md. Sohel Alam (Client code # 23176 of MTB Securities Limited) was the top seller of "ORIONINFU" share from 21.06.2022 to 12.10.2022. The said client bought 3,817,677 and sold 2,839,973 shares which is 9.74% of total traded share of "ORIONINFU" during the period. However, the aforesaid client was involved with the accounts mentioned earlier from which they traded shares of "ORIONINFU" during the investigation period.

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B. Trade details of Md. Sohel Alam, Mohammad Ebadul Karim and their associates:

Observations- 1:

Mr. Md. Sohel Alam was the top buyer and Mohammad Ebadul Karim was the 2nd top buyer of "ORIONINFU" share for the period from 21.06.2022 to 12.10.2022. It may be mentioned that Mr. Md. Sohel Alam is the brother-in-law of Mohammad Ebadul Karim. However, the aforesaid clients were involved with the following accounts from which they traded shares of "ORIONINFU" during the investigation period. Details are as follows:

Client Code	Client Name	Name of TREC Holder	Remarks
23176	Md. Sohel Alam	MTB Securities Limited	Own
3371	Mohammad Ebadul Karim	AB Securities Limited	Mohammad Ebadul Karim is the brother-in-law of Md. Sohel Alam
10310	Mohammad Ebadul Karim	MTB Securities Limited	
3214	Risana Karim	AB Securities Limited	Daughter of Mohammad Ebadul Karim
11755	Risana Karim	UCB Stock Brokerage Limited	
11788	Risana Karim	UCB Stock Brokerage Limited	
5058	Beacon Medicare Ltd.	AB Securities Limited	Mohammad Ebadul Karim is the contact person of the BO Account and he is the Managing Director of Beacon Medicare Ltd.
CM489	Beacon Medicare Ltd.	City Bank Capital Resources Ltd.	
22936	Beacon Pharmaceuticals Ltd-EPF	MTB Securities Limited	Mohammad Ebadul Karim is the contact person of the BO Account and he is the Managing Director of Beacon Pharmaceuticals Ltd.
22985	Beacon Pharmaceuticals Ltd-EGF	MTB Securities Limited	
7053	Beacon Pharmaceuticals Ltd.	AB Securities Limited	
5674	Nurunnahar Karim	AB Securities Limited	Sister of Md. Sohel Alam and Spouse of Mohammad Ebadul Karim



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Individual Trade Patterns, Trade monitoring screenshots, Effects of "ORIONINFU" at DSE in public market by the said client and gain and loss statement of Md. Sohel Alam, Mohammad Ebadul Karim and their associates are given below (as per DSE trade data):

Table with columns for Date, Code, BO ID, Client Name, and Trade Data (Buy Qty, Rate, Sale Qty, Rate) for various codes including #23176, #3371, #10310, #3214, #11755, and #11788. Includes a total row at the bottom.

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EFFECTS OF "MONITORING" AT DSE (Both Public Market and Block Market) BY Mr. Sajer Alam, Mohammad Ebadul Karim and their associates:

Date	Buy	Sale	Cost of shares sold		Stock Position		Comparison with the Market			
	Qty.	Price	Amount	Price (W.Avg.)	Qty.	Price (W.Avg.)	Mkt Close Price	Market Buy (%)	Client Buy (%)	Client Trade (%)
21-06-22	10000	80.93	809307.80	0.00	0.00	0.00	80.93	2.11%	2.99%	2.99%
22-06-22	3100	82.28	25509.30	0.00	0.00	0.00	81.25	1.75%	0.00%	1.75%
23-06-22	109934	84.55	929185.10	0.00	0.00	0.00	84.40	1.06%	47.60%	47.60%
24-06-22	82771	84.09	6960530.60	0.00	0.00	0.00	84.20	0.24%	60.91%	60.91%
25-06-22	72839	85.05	619466.90	0.00	0.00	0.00	85.10	1.07%	26.10%	26.10%
26-06-22	106779	86.86	927477.40	28868	87.12	225359.00	85.28	2.47%	13.86%	3.56%
29-06-22	106779	86.86	927477.40	28868	87.12	225359.00	85.28	2.47%	13.86%	3.56%
30-06-22	186728	87.42	16324191.60	39485	86.40	3411615.50	85.86	0.11%	40.10%	8.48%
03-07-22	74735	87.46	6536657.30	23664	86.44	2045569.60	86.02	0.34%	22.67%	7.18%
04-07-22	102145	89.48	9139429.90	149264	89.00	13283933.00	86.46	2.51%	17.18%	25.11%
05-07-22	219157	93.30	20447721.20	27938	92.57	2586117.60	88.17	4.01%	28.10%	3.89%
06-07-22	301419	94.20	28394845.40	16437	94.91	1560100.50	89.75	1.71%	17.47%	0.95%
07-07-22	218877	97.15	20777269.50	338295	95.85	3244529.40	90.93	1.68%	16.68%	26.38%
14-07-22	74065	95.64	7083893.00	69800	96.02	6701960.00	91.25	0.21%	14.26%	13.44%
17-07-22	64963	96.92	6296485.70	33000	97.65	3222460.00	91.59	2.51%	8.46%	4.30%
18-07-22	142851	99.78	14254341.30	136530	100.21	13661929.30	92.58	1.24%	10.33%	9.87%
19-07-22	78000	98.40	7380150.00	2951	99.30	293034.30	92.97	-1.80%	12.06%	0.47%
20-07-22	26110	105.05	2742884.90	73000	103.01	7519978.20	93.24	1.60%	4.46%	6.06%
21-07-22	171573	106.98	18254516.60	84000	106.49	894879.30	95.13	1.52%	14.29%	6.99%
24-07-22	571229	110.20	63060558.60	102331	109.89	11244736.50	100.10	1.12%	26.47%	4.73%
25-07-22	93666	107.45	10064063.70	166587	106.70	17771038.80	100.50	-0.46%	8.86%	15.75%
26-07-22	235741	108.88	25667106.20	159429	108.90	17362539.40	101.60	1.02%	22.55%	15.25%
27-07-22	205200	107.18	21992080.00	39294	108.67	4270071.40	102.22	-1.93%	25.55%	4.89%
28-07-22	60554	104.78	6349076.80	10004	104.70	1047418.80	102.30	-1.93%	25.55%	4.89%
31-07-22	49416	112.99	5583433.20	106421	112.42	11963994.50	102.58	-1.93%	25.55%	4.89%
01-08-22	439225	118.04	51847012.90	219940	118.68	26102709.50	105.62	1.08%	27.24%	13.64%
02-08-22	257877	116.72	30089232.00	177091	117.88	20874022.80	105.89	-0.61%	13.34%	13.34%
03-08-22	132844	123.23	16370777.80	286505	124.12	35860660.80	107.85	0.20%	13.34%	13.34%
04-08-22	210769	130.99	27681066.50	218069	131.41	28658984.80	110.12	0.61%	16.09%	16.09%
07-08-22	538022	130.84	70399999.40	239968	131.49	31556465.60	114.62	5.42%	15.56%	15.56%
08-08-22	219577	132.83	29166915.40	360736	132.81	47910937.10	116.25	-0.83%	42.85%	19.13%
10-08-22	272843	134.02	36666062.60	62084	134.00	8318996.30	118.30	0.15%	17.00%	27.93%
11-08-22	277252	130.64	36220800.30	144237	127.09	18331797.50	119.63	-2.39%	20.49%	10.66%
14-08-22	139669	129.37	18068488.70	20000	130.30	2606000.00	120.16	-1.07%	25.04%	3.59%
16-08-22	0	0.00	0.00	60000	131.92	7915150.00	120.16	0.00%	4.43%	4.43%
17-08-22	80673	144.63	11667992.40	75288	142.71	10739861.60	120.92	10.58%	9.87%	20.45%
21-08-22	9652	152.51	1471997.70	69000	150.32	10371897.30	121.04	8.44%	5.04%	5.74%
22-08-22	73050	166.25	12144771.50	90500	168.99	15293767.50	122.36	5.34%	6.62%	11.96%
23-08-22	6660	185.83	127596.00	31000	186.23	57731310.00	122.53	9.95%	2.88%	3.50%
24-08-22	167707	196.11	32899463.20	138833	198.73	27589676.70	127.34	4.60%	9.96%	8.25%
25-08-22	8513	212.50	180917.00	88500	210.02	17956893.60	127.63	10.00%	0.95%	9.52%
28-08-22	375975	233.09	8765554.00	98529	203.30	20031125.80	142.17	5.05%	19.25%	24.30%
29-08-22	81810	218.11	17843628.50	484906	216.23	104820270.00	144.46	5.67%	5.96%	41.27%
30-08-22	265494	257.05	6825550.90	611630	227.59	139202347.00	156.45	8.72%	20.84%	48.00%
31-08-22	439582	287.18	126346452.30	11000	287.72	316950.00	181.24	8.74%	34.62%	0.87%
01-09-22	348896	303.23	105794124.80	295753	283.55	83859391.40	197.25	7.48%	16.69%	14.14%
04-09-22	377275	312.66	11788124.20	417718	284.29	118752205.60	213.15	1.06%	19.42%	21.50%
05-09-22	58400	324.09	18926942.40	19400	314.17	6094990.00	215.87	4.08%	7.05%	2.34%



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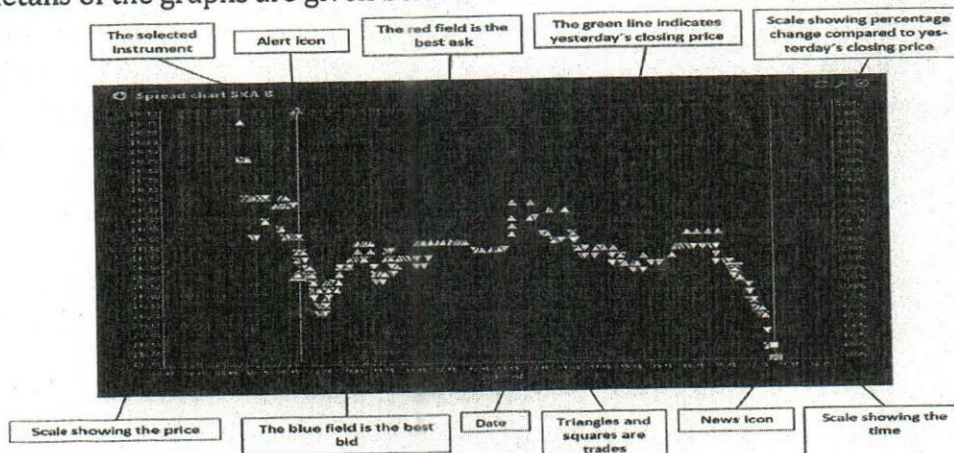
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06-09-22	125888	350.89	44173280.70	255485	304.14	77703854.30	222.70	56897213.20	2231353	222.70	496928459.11	1155440	354.40	8.58%	10.90%	22.11%	33.01%
07-09-22	274750	378.22	103914811.10	150000	329.58	49437125.80	239.75	35962803.82	2356103	239.75	564880466.39	1490653	385.40	8.75%	18.43%	10.06%	28.49%
08-09-22	176052	399.80	70209947.60	515990	356.87	184149970.00	250.81	129415577.92	2016165	250.81	505674836.07	1455825	419.00	8.72%	12.09%	35.44%	47.54%
11-09-22	607224	426.84	259190273.30	298491	385.72	115132972.70	291.56	87026876.82	2324826	291.56	677838202.55	1357765	497.60	-2.72%	44.73%	21.98%	66.71%
12-09-22	218477	399.62	87308814.60	100000	372.50	37250000.00	300.84	30083925.77	2443375	300.84	735063121.37	675535	400.80	-1.67%	32.34%	14.80%	47.14%
13-09-22	142124	401.30	57034847.20	141625	378.16	53556309.10	306.36	43388481.22	2443874	306.36	748709487.36	805037	395.30	-1.37%	17.65%	17.59%	35.25%
14-09-22	17000	428.82	7289882.50	711123	364.91	259493167.20	307.21	218462440.54	1749751	307.21	537536929.32	1304047	429.80	8.73%	1.30%	54.53%	55.84%
15-09-22	62486	427.50	32474013.00	9174	455.76	4777387.00	313.33	2937114.67	1809857	313.33	567074626.65	464646	467.40	8.75%	14.95%	2.02%	16.97%
18-09-22	115420	502.85	58039117.90	180250	436.43	78666320.00	324.69	58524956.39	1745027	324.69	566588788.16	1437759	508.20	8.73%	8.03%	12.54%	20.56%
19-09-22	134977	545.48	73626588.40	100599	477.17	48003079.60	340.54	34257920.02	1779405	340.54	605957456.54	414861	546.30	7.50%	32.54%	24.25%	56.78%
20-09-22	132492	585.05	77513825.00	11457	584.23	6693558.00	357.48	4095686.36	1900440	357.48	679375595.18	511515	583.10	6.74%	25.90%	2.24%	28.14%
21-09-22	315955	614.56	194174626.10	8490	586.59	4980145.90	394.13	3346173.12	2207905	394.13	870204048.16	782367	603.50	3.50%	40.38%	1.09%	41.47%
22-09-22	19429	579.70	11263010.90	118857	585.56	69598114.00	395.75	47037637.93	2108477	395.75	834429421.13	426402	575.60	-4.62%	4.56%	27.87%	32.43%
25-09-22	114706	567.41	65085086.10	40450	572.85	23171712.00	404.61	16366336.83	2182733	404.61	883148170.40	413576	565.70	-1.72%	27.74%	9.78%	37.52%
26-09-22	38630	569.42	21996587.50	0	0.00	0.00	0.00	0.00	2221363	407.47	905144757.90	210776	570.30	0.81%	18.33%	0.00%	18.33%
27-09-22	37156	568.32	21116512.80	82618	548.19	45289982.50	410.12	33883201.19	2175901	410.12	892378069.51	294784	570.40	0.02%	12.60%	28.03%	40.63%
28-09-22	67194	562.93	37825438.00	3000	570.00	1710000.00	414.70	1244089.32	2240095	414.70	928959418.19	295591	564.60	-1.02%	22.73%	1.01%	23.75%
29-09-22	1008	566.09	570620.00	41223	552.94	22794047.20	414.76	17097838.33	2199880	414.76	912432199.87	183670	584.10	3.45%	0.55%	22.44%	22.99%
02-10-22	8000	618.49	4947908.00	62600	559.14	35002410.00	415.50	26010469.21	2145280	415.50	891369638.66	282499	618.50	5.89%	2.83%	22.16%	24.99%
03-10-22	64193	649.42	41688420.00	6580	640.76	4216189.00	422.30	2778726.88	2202893	422.30	930279331.78	308072	652.50	5.50%	20.84%	2.14%	22.97%
04-10-22	9341	699.69	6535833.70	59341	618.94	36728477.40	423.47	25129144.90	2152893	423.47	911686020.58	425765	701.40	7.49%	2.19%	13.94%	16.13%
06-10-22	90	740.20	66618.00	25000	736.52	18413115.20	423.48	10587085.90	2127983	423.48	901165552.68	246954	753.70	7.46%	0.04%	10.12%	10.16%
10-10-22	51519	790.85	40743781.70	122473	742.44	90929107.90	432.17	52928816.72	2057029	432.17	888980517.65	555119	799.70	6.10%	9.28%	22.06%	31.34%
11-10-22	8797	850.60	7482701.20	10000	840.63	8406309.40	433.95	4339490.45	2055826	433.95	892123728.41	191924	859.60	7.49%	4.58%	5.21%	9.79%
12-10-22	6363	915.39	5824641.00	18900	887.51	16774029.90	435.43	8229713.27	2043289	435.43	889718656.14	344616	919.60	6.98%	1.85%	5.48%	7.33%
Total	10947158	236.30	2586852257.00	8903869	252.27	2246141781.80	190.61	1697133600.86	2043289	435.43	889718656.14						

ii. Trade monitoring screenshots of Md. Sohel Alam, Mohammad Ebadul Karim and their associates (public market):

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of Md. Sohel Alam, Mohammad Ebadul Karim and their associates were observed which influenced the price of ORIONINFU.

The details of the graphs are given below:



▲ Green triangle represents trade of ORIONINFU by Md. Sohel Alam, Mohammad Ebadul Karim and their associates

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△ White triangle represents trade of ORIONINFU by other clients

After scrutinizing the trade monitoring screenshots collected from Surveillance Department, it is found that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were involved in trading of shares of ORIONINFU which influenced price of the said shares on several dates:

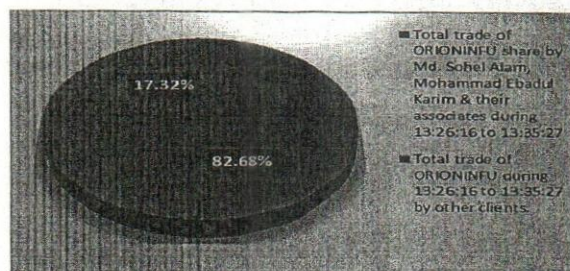
BOIDs: 1601880043377493; 1203710046187231; 1601880046187231; 1203710043493921;
1205590043493921; 1205590075153283; 1203710064180682; 1605170064180682;
1601880064821881; 1601880065365037; 1203710048667734; 1203710075253110
(Combined)

Date: 28-08-2022



It was observed in the above graph that on 28-08-2022, total number of trades of ORIONINFU in the market was 3303, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 525 which is approximately 15.89% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 1,389,879 whereas buy volume by the said client(s) was 375,975 which is approximately 27.05% of the total traded volume in the market.

On 28-08-2022, trading of ORIONINFU share was started at Tk. 227.90 which is Tk. 7.90 more than the YCP of Tk. 220.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:26:16 at price Tk. 220.60 and induced the same to rise to Tk. 238.00 up to 13:35:27. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:26:16 to 13:35:27, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 170,040 shares of ORIONINFU compared to the total traded share of 205,672. This is shown in the following Pie Chart.



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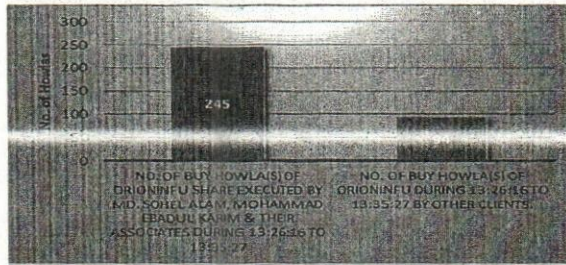
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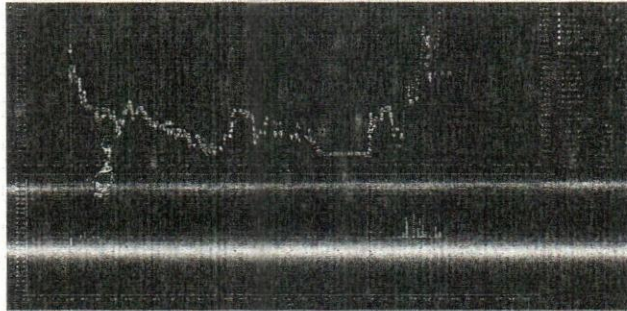
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 245 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 339 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 82.68% of the total trades of ORIONINFU shares by executing 245 of total 339 howlas from 13:26:16 to 13:35:27 on 28-08-2022. From 13:26:16 to 13:35:27, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 220.60 to Tk. 238.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 11.10 which is approximately 5.05% higher than YCP.

Date: 04-09-2022



It was observed in the above graph that on 04-09-2022, total number of trades of ORIONINFU in the market was 4000, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 649 which is approximately 16.23% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 1,539,903 whereas buy volume by the said client(s) was 377,275 which is approximately 24.50% of the total traded volume in the market.

On 04-09-2022, trading of ORIONINFU share was started at Tk. 324.00 which is Tk. 13.70 more than the YCP of Tk. 310.30. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:23:16 at price Tk. 292.50 and induced the same to rise to Tk. 330.00 up to 13:38:33. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 276,508 shares of ORIONINFU compared to the total traded share of 316,360. This is shown in the following Pie Chart.

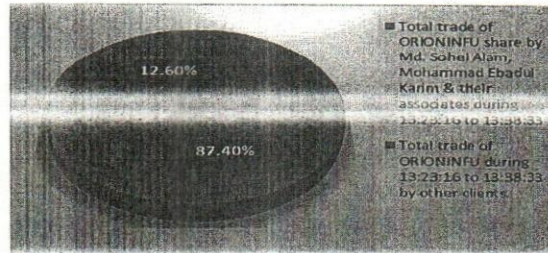
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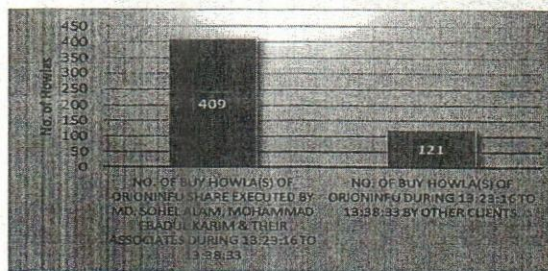
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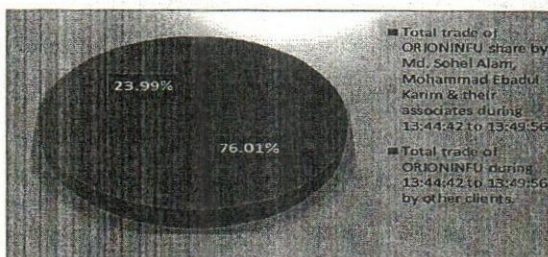


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 409 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 530 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 87.40% of the total trades of ORIONINFU shares by executing 409 of total 530 howlas from 13:23:16 to 13:38:33 on 04-09-2022. From 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 292.50 to Tk. 330.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:44:42 at price Tk. 312.20 and induced the same to rise to Tk. 334.00 up to 13:49:56. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:44:42 to 13:49:56, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 58,597 shares of ORIONINFU compared to the total traded share of 77,091. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 124 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 182 as shown in the following Bar Chart.

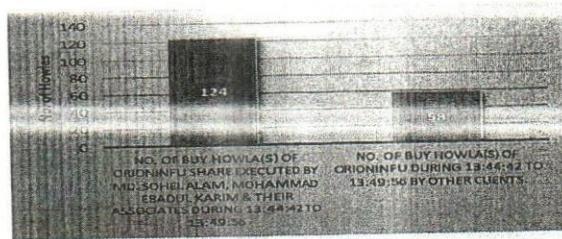
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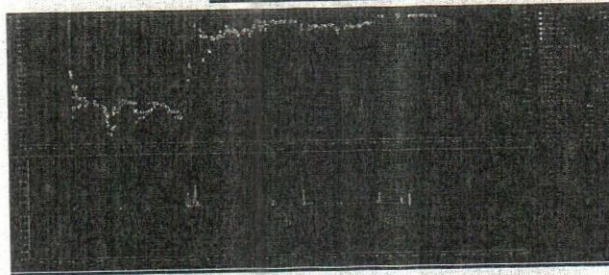
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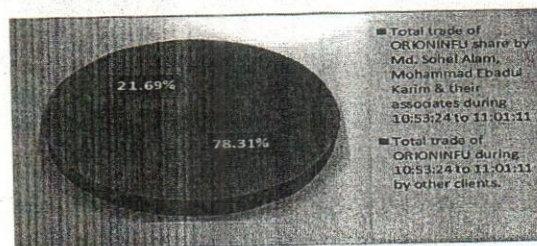
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 76.01% of the total trades of ORIONINFU shares by executing 124 of total 182 howlas from 13:44:42 to 13:49:56 on 04-09-2022. From 13:44:42 to 13:49:56, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 312.20 to Tk. 334.90. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 07-09-2022



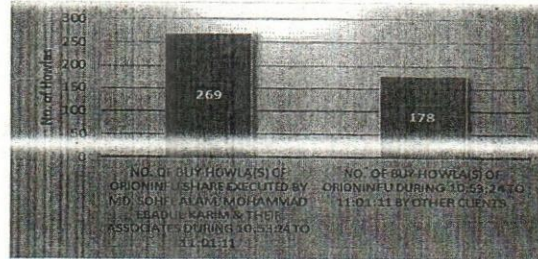
It was observed in the above graph that on 07-09-2022, total number of trades of ORIONINFU in the market was 2876, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 440 which is approximately 15.30% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 809,973 whereas buy volume by the said client(s) was 274,750 which is approximately 33.92% of the total traded volume in the market. It is evident that the client had significant participation in the market on 07-09-2022 in trading of ORIONINFU share.

On 07-09-2022, trading of ORIONINFU share was started at Tk. 368.70 which is Tk. 14.30 more than the YCP of Tk. 354.40. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:53:24 at price Tk. 354.60 and induced the same to rise to Tk. 385.00 up to 11:01:11. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:53:24 to 11:01:11, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 144,187 shares of ORIONINFU compared to the total traded share of 184,118. This is shown in the following Pie Chart.



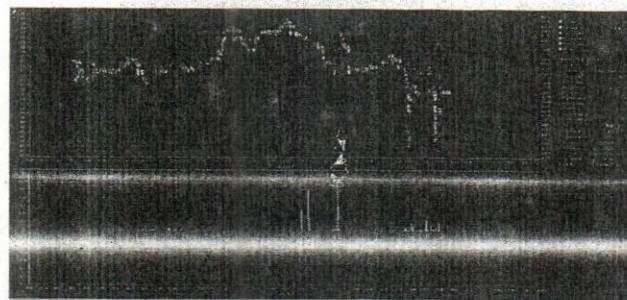
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 269 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 447 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 78.31% of the total trades of ORIONINFU shares by executing 269 of total 447 howlas from 10:53:24 to 11:01:11 on 07-09-2022. From 10:53:24 to 11:01:11, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 354.60 to Tk. 385.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 31.00 which is approximately 8.75% higher than YCP.

Date: 11-09-2022



It was observed in the above graph that on 11-09-2022, total number of trades of ORIONINFU in the market was 4040, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 1067 which is approximately 26.41% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 1,054,222 whereas buy volume by the said client(s) was 607,224 which is approximately 57.60% of the total traded volume in the market. It is evident that the client had significant participation in the market on 11-09-2022 in trading of ORIONINFU share.

On 11-09-2022, trading of ORIONINFU share was started at Tk. 420.00 which is Tk. 1.00 more than the YCP of Tk. 419.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 12:33:43 at price Tk. 415.40 and induced the same to rise to Tk. 435.00 up to 12:38:03. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 12:33:43 to 12:38:03, Md. Sohel Alam,

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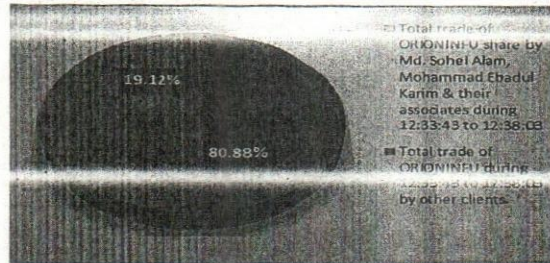
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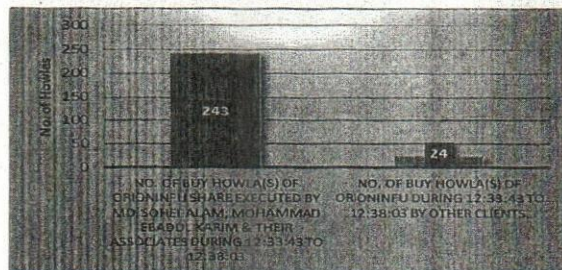
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Mohammad Ebadul Karim and their associates bought 216,878 shares of ORIONINFU compared to the total traded share of 268,138. This is shown in the following Pie Chart.

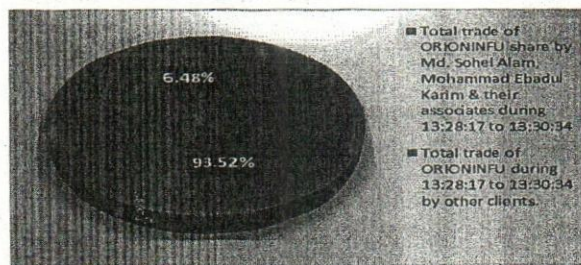


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 243 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 267 as shown in the following Bar Chart.



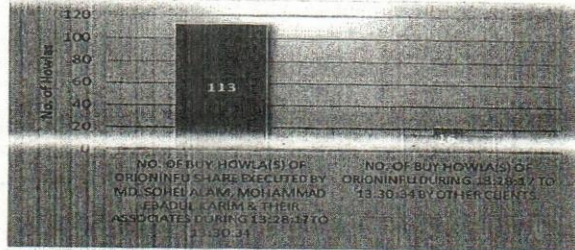
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 80.88% of the total trades of ORIONINFU shares by executing 243 of total 267 howlas from 12:33:43 to 12:38:03 on 11-09-2022. From 12:33:43 to 12:38:03, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 415.40 to Tk. 435.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:17 at price Tk. 392.10 and induced the same to rise to Tk. 422.50 up to 13:30:34. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 40,710 shares of ORIONINFU compared to the total traded share of 43,530. This is shown in the following Pie Chart.



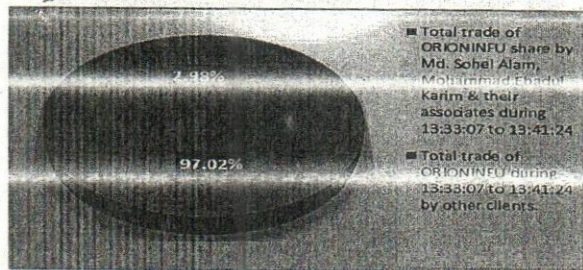
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 113 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 129 as shown in the following Bar Chart.

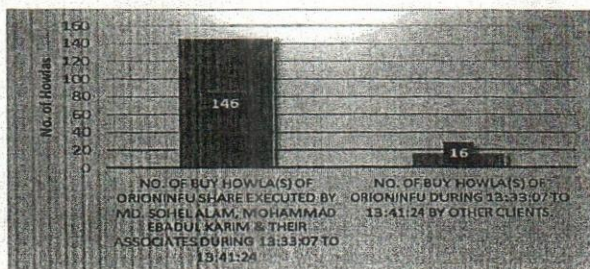


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 93.52% of the total trades of ORIONINFU shares by executing 113 of total 129 howlas from 13:28:17 to 13:30:34 on 11-09-2022. From 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 392.10 to Tk. 422.50. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:07 at price Tk. 406.40 and induced the same to rise to Tk. 417.80 up to 13:41:24. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:33:07 to 13:41:24, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 45,000 shares of ORIONINFU compared to the total traded share of 46,381. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 146 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 162 as shown in the following Bar Chart.



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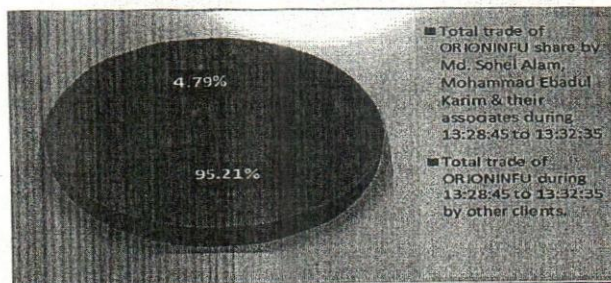
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 97.02% of the total trades of ORIONINFU shares by executing 146 of total 162 howlas from 13:33:07 to 13:41:24 on 11-09-2022. From 13:33:07 to 13:41:24, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 406.40 to Tk. 417.80. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 12-09-2022



It was observed in the above graph that on 12-09-2022, total number of trades of ORIONINFU in the market was 2711, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 465 which is approximately 17.15% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 555,535 whereas buy volume by the said client(s) was 218,477 which is approximately 39.33% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-09-2022 in trading of ORIONINFU share.

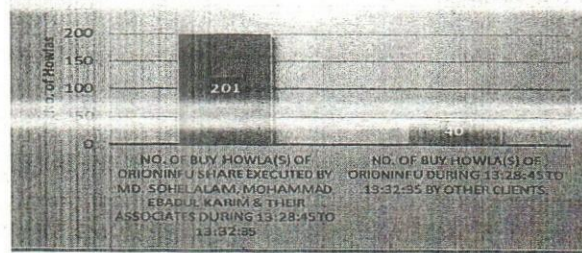
On 12-09-2022, trading of ORIONINFU share was started at Tk. 400.00 which is Tk. 7.60 less than the YCP of Tk. 407.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:45 at price Tk. 390.80 and induced the same to rise to Tk. 410.00 up to 13:32:35. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 99,490 shares of ORIONINFU compared to the total traded share of 104,491. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 201 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 241 as shown in the following Bar Chart.

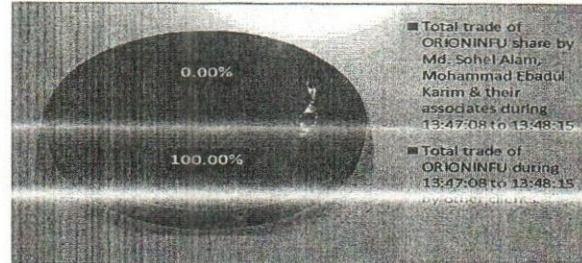
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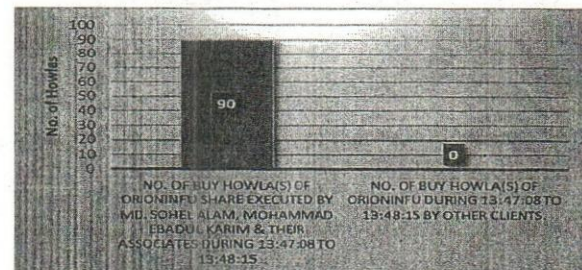


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.21% of the total trades of ORIONINFU shares by executing 201 of total 241 howlas from 13:28:45 to 13:32:35 on 12-09-2022. From 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 390.80 to Tk. 410.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:47:08 at price Tk. 390.00 and induced the same to rise to Tk. 404.00 up to 13:48:15. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:47:08 to 13:48:15, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 50,000 shares of ORIONINFU compared to the total traded share of 50,000. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 90 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 90 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 100.00% of the total trades of ORIONINFU shares by executing 90 of total 90 howlas from 13:47:08 to 13:48:15 on 12-09-2022. From 13:47:08 to 13:48:15, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to

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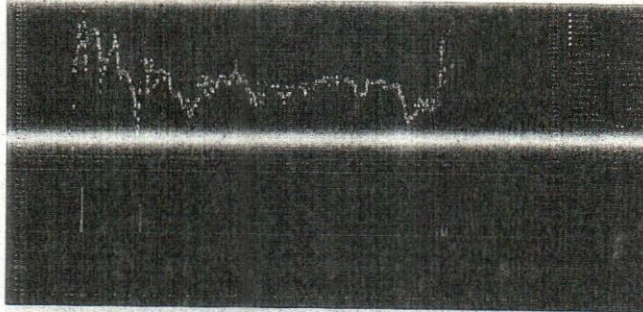
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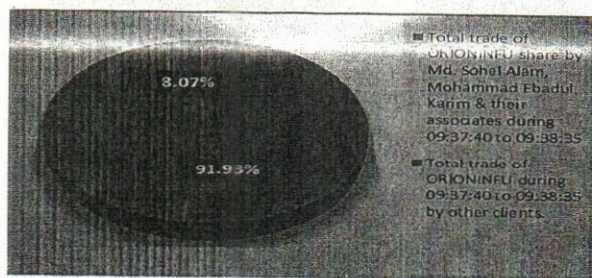
rise from Tk. 390.00 to Tk. 404.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 21-09-2022



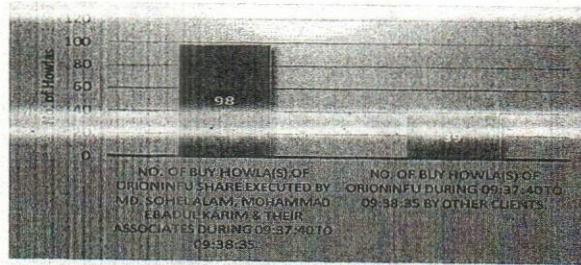
It was observed in the above graph that on 21-09-2022, total number of trades of ORIONINFU in the market was 3376, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 530 which is approximately 15.70% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 664,877 whereas buy volume by the said client(s) was 315,955 which is approximately 47.52% of the total traded volume in the market. It is evident that the client had significant participation in the market on 21-09-2022 in trading of ORIONINFU share.

On 21-09-2022, trading of ORIONINFU share was started at Tk. 565.00 which is Tk. 18.10 less than the YCP of Tk. 583.10. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 9:37:40 at price Tk. 615.00 and induced the same to rise to Tk. 626.50 up to 9:38:35. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 100,000 shares of ORIONINFU compared to the total traded share of 108,783. This is shown in the following Pie Chart.



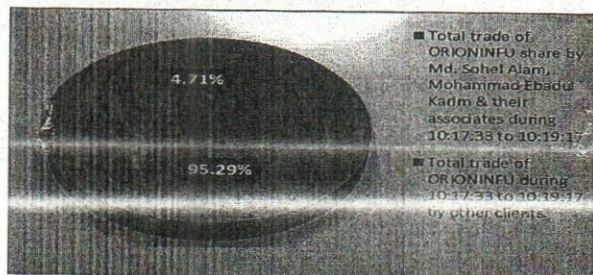
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 98 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 137 as shown in the following Bar Chart.

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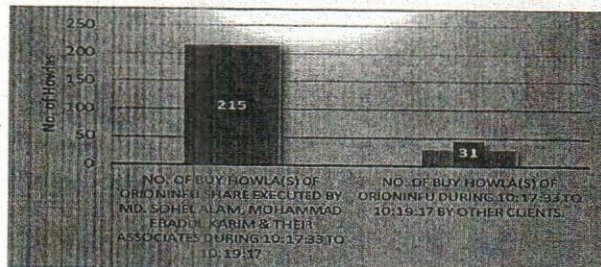


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 91.93% of the total trades of ORIONINFU shares by executing 98 of total 137 howlas from 9:37:40 to 9:38:35 on 21-09-2022. From 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 615.00 to Tk. 626.50. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:17:33 at price Tk. 595.00 and induced the same to rise to Tk. 616.00 up to 10:19:17. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:17:33 to 10:19:17, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 138,639 shares of ORIONINFU compared to the total traded share of 145,489. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 215 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 246 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.29% of the total trades of ORIONINFU shares by executing 215 of total 246 howlas from 10:17:33 to 10:19:17 on 21-09-2022. From 10:17:33 to 10:19:17, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price

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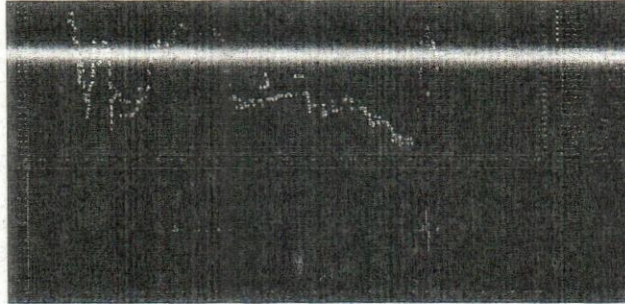
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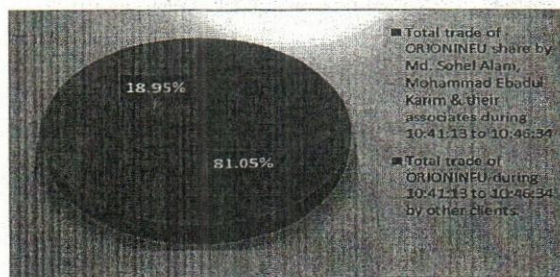
to rise from Tk. 595.00 to Tk. 616.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 20.40 which is approximately 3.50% higher than YCP.

Date: 25-09-2022



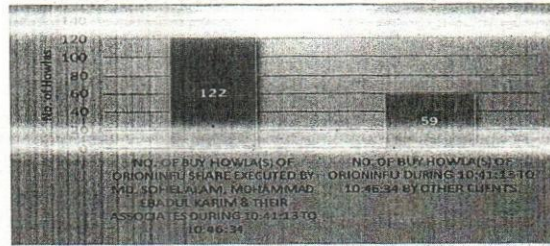
It was observed in the above graph that on 25-09-2022, total number of trades of ORIONINFU in the market was 2567, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 715 which is approximately 27.85% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 393,576 whereas buy volume by the said client(s) was 114,706 which is approximately 29.14% of the total traded volume in the market.

On 25-09-2022, trading of ORIONINFU share was started at Tk. 577.00 which is Tk. 1.40 more than the YCP of Tk. 575.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:41:13 at price Tk. 567.90 and induced the same to rise to Tk. 575.00 up to 10:46:34. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 15,042 shares of ORIONINFU compared to the total traded share of 18,560. This is shown in the following Pie Chart.



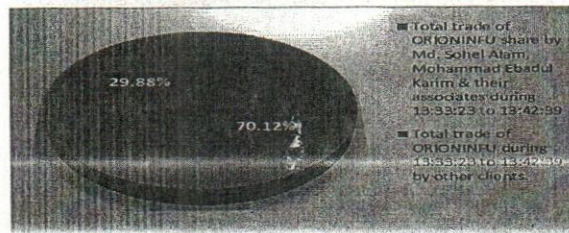
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 122 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 181 as shown in the following Bar Chart.

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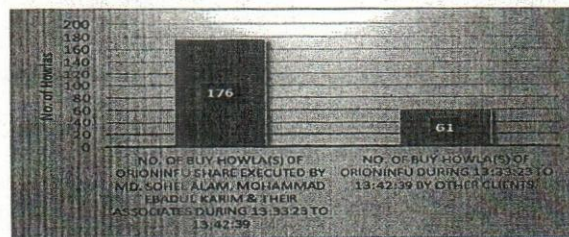


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 81.05% of the total trades of ORIONINFU shares by executing 122 of total 181 howlas from 10:41:13 to 10:46:34 on 25-09-2022. From 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 567.90 to Tk. 575.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:23 at price Tk. 537.50 and induced the same to rise to Tk. 573.00 up to 13:42:39. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:33:23 to 13:42:39, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 61,100 shares of ORIONINFU compared to the total traded share of 87,134. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 176 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 237 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 70.12% of the total trades of ORIONINFU shares by executing 176 of total 237 howlas from 13:33:23 to 13:42:39 on 25-09-2022. From 13:33:23 to 13:42:39, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 537.50 to Tk. 573.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

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Summary of the trade by Md. Sohel Alam, Mohammad Ebadul Karim and their associates.

Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
147.80	46896940.00	4577698	332.17	1520592361.40	10947158	236.30	2586852257.00	8903869	252.27	2246141781.80	190.61	1697133600.86	2043289	435.43	889718656.14	

iv). Gain and Loss by Md. Sohel Alam, Mohammad Ebadul Karim and their associates from 21.06.2022 to 12.10.2022

Realized Capital gain(loss)per unit	61.66	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	32.35%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	549,008,180.94	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (44846)	919.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	484.17	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	111.19%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	989,289,908.26	Quantity of Stock Position x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 10,947,158 shares and sold 8,903,869 shares of "ORIONINFU" from public market during the period from 21.06.2022 to 12.10.2022. With the said BO accounts, Mr. Md. Sohel Alam, Mohammad Ebadul Karim and their associates traded 80.35% shares of "ORIONINFU" during the investigation period and realized a capital gain of Tk. 549,008,180.94 from the trading of "ORIONINFU" share during the investigation period. They also had unrealized gain of TK. 989,289,908.26 during the period.

Findings-1:

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 Mr. Md. Sohel Alam, Mohammad Ebadul Karim and their associates were involved directly and indirectly in a series of transactions of ORIONINFU share with his aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

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Investigation Report

It appears that Md. Sohel Alam, Mohammad Ebadul Karim and their associates have violated the followings:

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

Observations- 2:

After analyzing the trade pattern of the clients, the investigation team found that Md. Sohel Alam (BOID# 1601880043377493), Mohammad Ebadul Karim (BOID#1203710046187231, 1601880046187231), Risana Karim (BOID# 1203710043493921, 1205590043493921, 1205590075153283), BEACON Medicare Ltd. (BOID# 1203710064190682, 1605170064190682), Beacon Pharmaceuticals Ltd-EPF (BOID# 1601880064821881, 1601880065365037), Nurunnahar Karim (BOID# 1203710075253110) were involved in trading of "ORIONINFU" shares by those accounts with misleading appearance of active trading on different date(s) from 21.06.2022 to 12.10.2022.

➤ Table: Counterparty trades:

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
04/07/2022	13:10:05	253520692	ORIONINFU	1000	88.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:10	253520746	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520897	ORIONINFU	1000	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520898	ORIONINFU	100	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520899	ORIONINFU	900	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520900	ORIONINFU	200	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520901	ORIONINFU	800	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520902	ORIONINFU	300	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520903	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520904	ORIONINFU	400	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520905	ORIONINFU	600	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520906	ORIONINFU	500	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520907	ORIONINFU	500	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520908	ORIONINFU	600	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520909	ORIONINFU	400	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520910	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520911	ORIONINFU	300	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520912	ORIONINFU	800	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520913	ORIONINFU	100	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:27	253520968	ORIONINFU	1000	89	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:36:25	253540578	ORIONINFU	100	89	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	14:27:26	253589063	ORIONINFU	1647	89.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	14:27:34	253589377	ORIONINFU	1000	89.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
05/07/2022	10:42:06	253639282	ORIONINFU	1000	92.8	DSEUBR	11755	1205590043493921	DSEABF	3371	1203710046187231	Public
07/07/2022	14:14:57	254072142	ORIONINFU	5000	95.7	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
14/07/2022	10:20:30	254396810	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396811	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396812	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public



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12/07/2022	10:20:30	254396814	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396815	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396816	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396817	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396818	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396819	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396820	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396821	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396822	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396823	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396824	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396825	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396826	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396827	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:20:30	254396828	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
12/07/2022	10:06:51	255040895	ORIONINFU	150	107	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
21/07/2022	11:48:58	255103496	ORIONINFU	3193	106.1	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
21/07/2022	10:21:17	255201389	ORIONINFU	544	111.1	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
24/07/2022	10:22:18	255202212	ORIONINFU	4331	110.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
24/07/2022	10:51:00	255220908	ORIONINFU	525	112.4	DSEABF	5058	1203710064190682	DSEABF	3371	1203710046187231	Public
24/07/2022	10:51:00	255220909	ORIONINFU	153	112.4	DSEABF	5058	1203710064190682	DSEABF	3371	1203710046187231	Public
25/07/2022	10:44:29	255221024	ORIONINFU	1900	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:34	255221057	ORIONINFU	900	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:45	255221139	ORIONINFU	100	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255222873	ORIONINFU	1000	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255222874	ORIONINFU	904	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255222945	ORIONINFU	96	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255222946	ORIONINFU	904	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:26	255223043	ORIONINFU	896	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:26	255223044	ORIONINFU	1000	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:43	255223159	ORIONINFU	904	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:23:44	255234170	ORIONINFU	347	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:25:24	255234841	ORIONINFU	377	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:40:39	255234170	ORIONINFU	1000	106.2	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	14:29:30	255440853	ORIONINFU	495	108.4	DSEABF	3214	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	13:13:07	255581303	ORIONINFU	1000	108.4	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
26/07/2022	14:29:30	255635030	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635036	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635038	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635040	ORIONINFU	703	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635041	ORIONINFU	2797	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635043	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635045	ORIONINFU	2703	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635046	ORIONINFU	797	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635048	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635049	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635050	ORIONINFU	1703	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:30	255635051	ORIONINFU	1297	109	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:49	255635787	ORIONINFU	523	109.5	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:49	255635789	ORIONINFU	3962	109.5	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:49	255635790	ORIONINFU	10000	109.5	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public
26/07/2022	14:29:49	255635791	ORIONINFU	6038	109.5	DSEMTB	23176	1601880043377493	DSEMTB	23176	1601880043377493	Public

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12/07/2022	14:29:49	25635793	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
12/07/2022	14:29:49	25635794	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
12/07/2022	14:29:49	25635795	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
12/07/2022	14:29:49	25635796	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
12/07/2022	14:29:49	25635797	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
26/07/2022	14:29:49	25635798	ORIONINFU	275	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710064190682	Public
26/07/2022	14:29:49	25635799	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
26/07/2022	14:29:49	25635800	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145468	ORIONINFU	760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145469	ORIONINFU	9240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145470	ORIONINFU	10000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145471	ORIONINFU	5760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145472	ORIONINFU	4240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145588	ORIONINFU	20760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145589	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145590	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145591	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145592	ORIONINFU	2440	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
02/08/2022	14:23:26	256351285	ORIONINFU	15000	117.4	DSEABF	5058	1203710064190682	DSEABF	3214	1203710064190682	Public
04/08/2022	14:13:30	256753601	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753602	ORIONINFU	8300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753603	ORIONINFU	2700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753604	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753605	ORIONINFU	6300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753606	ORIONINFU	4700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753607	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753608	ORIONINFU	4300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753609	ORIONINFU	6700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753610	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753611	ORIONINFU	2300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753612	ORIONINFU	8700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753613	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256753614	ORIONINFU	300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:42	256753894	ORIONINFU	700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760170	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760171	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760172	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760173	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760174	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760175	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760176	ORIONINFU	7000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:18:18	256760177	ORIONINFU	1000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
07/08/2022	12:26:21	256890221	ORIONINFU	3399	128.3	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	12:26:27	256890263	ORIONINFU	4000	128.3	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	12:26:31	256890291	ORIONINFU	4000	128.3	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	14:12:39	256957459	ORIONINFU	2200	131.6	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	14:12:39	256957461	ORIONINFU	2200	131.6	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	14:12:39	256957462	ORIONINFU	2200	131.6	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	14:12:39	256957463	ORIONINFU	1310	131.6	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public
07/08/2022	14:13:16	256958210	ORIONINFU	890	131.8	DSEABF	3371	1203710046187231	DSEABF	11755	1205590043493921	Public

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Date	Time	Symbol	Quantity	Price	Order Type	Account No.	Account Name	Trade Type
07/09/2022	10:58:21	261562640	100	378.9	DSECB	CM489	1605170064190682	Public
07/09/2022	10:58:31	261562780	430	378.9	DSECB	CM489	1605170064190682	Public
07/09/2022	10:58:40	261562961	370	378.9	DSECB	CM489	1605170064190682	Public
07/09/2022	12:18:26	261633699	1000	384.3	DSEMTB	23176	1601880043377493	Public
07/09/2022	13:13:13	261675217	279	384.5	DSEMTB	23176	1601880043377493	Public
07/09/2022	13:35:38	261703566	2279	385.4	DSEMTB	10310	1601880046187231	Public
11/09/2022	12:35:26	262145596	500	429.0	DSEMTB	23176	1601880043377493	Public
11/09/2022	12:35:46	262145887	500	432.6	DSEMTB	23176	1601880043377493	Public
11/09/2022	12:36:12	262146278	500	434.4	DSEMTB	23176	1601880043377493	Public
11/09/2022	12:37:09	262147015	500	433.9	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:41:34	262642118	63	400.3	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:41:34	262642119	937	400.3	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:45:34	262648774	9000	407.9	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:45:34	262648776	9000	407.9	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:45:40	262648931	2649	407.9	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:46:09	262649775	8375	407.9	DSEMTB	23176	1601880043377493	Public
13/09/2022	13:46:09	262649777	625	407.9	DSEMTB	23176	1601880043377493	Public
15/09/2022	09:33:15	262885099	1000	467.4	DSEMTB	23176	1601880043377493	Public
15/09/2022	09:33:20	262885153	2000	467.4	DSEMTB	23176	1601880043377493	Public
15/09/2022	09:33:39	262885490	900	467.4	DSEMTB	11788	1205590075153283	Block
15/09/2022	12:33:03	263014249	3100	467.4	DSEMTB	23176	1601880043377493	Public
19/09/2022	09:32:05	263375227	527	546	DSEMTB	23176	1601880043377493	Public
19/09/2022	09:32:21	263375554	861	546.2	DSEMTB	23176	1601880043377493	Public
19/09/2022	09:32:30	263375800	1000	546.3	DSEMTB	23176	1601880043377493	Public
21/09/2022	10:17:33	2640302257	1000	595	DSEMTB	23176	1601880043377493	Public
21/09/2022	10:19:12	2640304019	240	615	DSEMTB	10310	1601880046187231	Public
22/09/2022	13:51:02	264462870	2650	575.6	DSEABF	3371	1203710046187231	Public
22/09/2022	13:51:02	264462872	5000	575.6	DSEABF	3371	1203710046187231	Public
25/09/2022	11:06:00	264580789	165	574.5	DSEMTB	23176	1601880043377493	Public
25/09/2022	11:07:35	264582014	465	574.6	DSEMTB	23176	1601880043377493	Public
25/09/2022	11:07:40	264582094	135	574.5	DSEMTB	23176	1601880043377493	Public
25/09/2022	13:41:10	264709537	1000	568.9	DSEMTB	23176	1601880043377493	Public
27/09/2022	13:41:01	265138996	2500	573.6	DSEMTB	10310	1601880046187231	Public
28/09/2022	13:38:26	265346913	1852	570	DSEMTB	23176	1601880043377493	Public
28/09/2022	13:38:26	265346914	1148	570	DSEMTB	23176	1601880043377493	Public
10/10/2022	09:43:34	266393189	12	797	DSEMTB	23176	1601880043377493	Public
10/10/2022	09:43:35	266393211	97	797	DSEMTB	23176	1601880043377493	Public

(DSE trade data)

Findings-2:

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

(f) create a false and misleading appearance of active trading in any security.

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It is observed that Mr. Md. Sohel Alam, Mohammad Ebadul Karim, Risana Karim, BEACON Medicare Ltd. Beacon Pharmaceuticals Ltd-EPF and Nurunnahar Karim traded 1,074,818 shares of ORIONINFU among each other during the investigation period.

Contravention(s)-2:

It appears that Md. Sohel Alam (BOID# 1601880043377493), Mohammad Ebadul Karim (BOID # 1203710046187231, 1601880046187231), Risana Karim (BOID# 1203710043493921, 1205590043493921, 1205590075153283), BEACON Medicare Ltd. (BOID# 1203710064190682, 1605170064190682), Beacon Pharmaceuticals Ltd-EPF (BOID# 1601880064821881, 1601880065365037), Nurunnahar Karim (BOID# 1203710075253110) have violated the following:

- **Section 17 (e) (ii)** of the Securities and Exchange Ordinance, 1969 by executing trade of "ORIONINFU" share by creating false and misleading appearance while trading in that security.

Observation - 3:

As per transaction ledger, instrument ledger, portfolio statement and DSE trade data of **Md. Sohel Alam, Mohammad Ebadul Karim & their Associates**, collected from the respective Depository Participants, it was observed that they had collectively acquired more than 10% shares of "ORIONINFU" as on different date(s) during the investigation period. Details are given below:

Sl. No	Client Name	Client Code	Name of TREC Holder	07-08-22		08-08-22		10-08-22		11-08-22		14-08-22		16-08-22		17-08-22		21-08-22	
				Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage
1	MD. SOHEL ALAM	23176	Wib Securities Limited	83622.00	4.21%	939852.00	4.71%	1617332.00	5.00%	937339.00	4.60%	1024908.00	5.03%	1024908.00	5.03%	1025738.00	5.04%	1019099.00	5.05%
2	MOHAMMAD EBADUL KARIM	3371	AB Securities Limited	658263.00	3.23%	543263.00	2.67%	646263.00	3.17%	648946.00	3.19%	661046.00	3.25%	601046.00	2.95%	641631.00	3.15%	572631.00	2.81%
3	MOHAMMAD EBADUL KARIM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
4	RISANA KARIM	3214	AB Securities Limited	66784.00	0.33%	184224.00	0.90%	142140.00	0.70%	195061.00	0.96%	195061.00	0.96%	195061.00	0.96%	160061.00	0.79%	166361.00	0.82%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	40000.00	0.20%	40000.00	0.20%	40000.00	0.20%	20000.00	0.10%	40000.00	0.20%	40000.00	0.20%	39000.00	0.19%		0.00%
6	RISANA KARIM	11788	UCB Stock Brokerage Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	BEACON MEDICARE LTD.	5058	AB Securities Limited	425837.00	2.09%	180101.00	0.88%	272457.00	1.34%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%
8	BEACON MEDICARE LTD.	CM489	City Bank Capital Resources Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
9	BEACON PHARMACEUTICALS LTD-EPF	22936	MTB Securities Limited	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%
10	BEACON PHARMACEUTICALS LTD-EGF	22985	MTB Securities Limited	45000.00	0.22%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%
11	Beacon Pharmaceuticals Ltd.	7053	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
12	NURUNNAHAR KARIM	5674	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
Total				2228736.00	10.95%	2087577.00	10.25%	2298336.00	11.29%	2431351.00	11.94%	2551020.00	12.53%	2491020.00	12.24%	2496435.00	12.26%	2398087.00	11.78%
Total No. of Outstanding Securities				20359760	10.95%	10.25%	11.29%	11.94%	12.53%	12.24%	12.26%	11.78%							



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From the above table, it is observed that **Md. Sohel Alam, Mohammad Ebadul Karim & their associates** jointly hold more than 10% shares of the total paid up shares of "ORIONINFU" which violates বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ since there was no declaration to buy more than 10% shares of the above instruments.

Findings - 3:

As per উপ-বিধি (১) (ক) of বিধি ২ 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 প্রণয় করে....."

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।"

It is found that **Md. Sohel Alam, Mohammad Ebadul Karim & their Associates** jointly hold more than 10% shares of 'ORIONINFU' on the aforesaid dates during the investigation period. Through the aforesaid activities, it appears that **Md. Sohel Alam, Mohammad Ebadul Karim & their associates** violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

Contravention - 4:

It appears that **Md. Sohel Alam, Mohammad Ebadul Karim & their 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 "ORIONINFU" without declaration.



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INDIVIDUAL TRADE PATTERN OF BEACON PHARMACEUTICALS LTD.:

i. Individual Trade Patterns of BEACON PHARMACEUTICALS LTD-EPF. (Only Public Market):

Date	Code # 22936				Total					
	BO ID # 1601880064821881									
	BEACON PHARMACEUTICALS LTD-EPF									
	MTB 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
06-07-2022	113735	93.77	0	0.00	113735	93.77	10664376.10	0	0.00	0.00
25-07-2022	0	0.00	113735	106.21	0	0.00	0.00	113735	106.21	12079543.00
31-08-2022	43000	286.23	0	0.00	43000	286.23	12307713.50	0	0.00	0.00
08-09-2022	97000	384.68	0	0.00	97000	384.68	37313649.30	0	0.00	0.00
Total	253735		113735		253735			113735		

ii. Effects of 'ORIONINFU' at DSE by BEACON PHARMACEUTICALS LTD-EPF (Public and Block Market):

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		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 (%)
Opening Balance										0	0.00	0.00						
06-07-2022	113735	93.77	10664376.10	0	0.00	0.00	0	0.00	0.00	113735	93.77	10664376.10	1725375	95.00	1.71%	6.59%	0.00%	6.59%
25-07-2022	0	0.00	0.00	113735	106.21	12079543.00	0	93.77	10664376.10	0	0.00	0.00	1057758	107.80	-0.46%	0.00%	10.75%	10.75%
27-07-2022	133000	106.80	14204400.00	0	0.00	0.00	0	0.00	0.00	133000	106.80	14204400.00	803203	106.80	-1.93%	16.56%	0.00%	16.56%
28-08-2022	0	0.00	0.00	54800	200.80	11003840.00	0	106.80	5852640.00	78200	106.80	8351760.00	1952979	231.10	5.05%	0.00%	2.81%	2.81%
29-08-2022	50000	211.00	10550000.00	0	0.00	0.00	0	0.00	0.00	128200	147.44	18901760.00	1373157	244.20	5.67%	3.64%	0.00%	3.64%
30-08-2022	0	0.00	0.00	55500	223.00	12376500.00	0	147.44	8182899.22	72700	147.44	10718860.78	1274144	266.50	8.72%	0.00%	4.26%	4.26%
31-08-2022	43000	286.23	12307713.50	0	0.00	0.00	0	0.00	0.00	115700	199.02	23026574.28	1270924	288.70	8.74%	3.38%	0.00%	3.38%
07-09-2022	0	0.00	0.00	115000	324.00	37260000.00	0	199.02	22887260.52	700	199.02	139313.76	1490653	385.40	8.75%	0.00%	7.71%	7.71%
08-09-2022	97000	384.68	37313649.30	0	0.00	0.00	0	0.00	0.00	97700	383.35	37452963.06	1455825	419.00	8.72%	6.66%	0.00%	6.66%
Total	436735	194.72	85040138.90	339035	214.49	72719883.00	0	140.36	47587175.84	97700	383.35	37452963.06						

Summary of the trade by BEACON PHARMACEUTICALS LTD-EPF

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
183000	135.27	24754400.00	225300	269.15	60640340.00	436735	194.72	85040138.90	339035	214.49	72719883.00	140.36	47587175.84	97700	383.35	37452963.06

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iii. GAIN/LOSS BY BEACON PHARMACEUTICALS LTD-EPF FROM 21.06.2022 TO 12.10.2022:

Realized Capital gain(loss)per unit	74.13	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	52.81%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	25,132,707.16	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (12-10-2022)	919.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	536.25	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	139.89%	Unrealized gain (loss) per unit / Average Price of Stock Position
Unrealized gain(loss) TK	52,391,956.94	Quantity of Stock Position x Unrealized gain (loss) per unit

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক মার্চ ০৯, ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/২৬০ স্মারকমূলে BEACON PHARMACEUTICALS LTD-EPF-কে মার্চ ২৭, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে BEACON PHARMACEUTICALS LTD-EPF এর পক্ষে Mr. Md. Al-Masum (on behalf) শুনানীতে উপস্থিত হয়ে মার্চ ২০, ২০২৩ তারিখের BPL/CA/BSEC/SHOWCAUSE-REPLY/2023/MAR/02 পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With reference to your letter No. BSEC/Enforcement/3406/2023/260, Dated 09 March, 2023 on the above subject, we like to inform that, we have been maintaining 1 (one) nos Beneficial Owner account bearing No. 1601880064821881 with MTB Securities Limited. As per Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 the acquiring a number of shares at a time is strictly prohibited. But unfortunately, we have made few transactions without knowing the restrictions of the Act from the period of 21 June 2022 to 12 October 2022. 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."

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যেহেতু, BEACON PHARMACEUTICALS LTD-EPF-এর উল্লিখিত বক্তব্য এবং অন্য প্রবিধানের সফল প্রতীক্ষণ বা পে, তার বিরুদ্ধে উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে BEACON PHARMACEUTICALS LTD-EPF-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, BEACON PHARMACEUTICALS LTD-EPF উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ও Section 17 (e) (ii) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছেন;

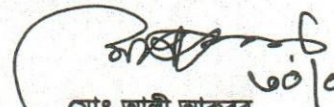
যেহেতু, BEACON PHARMACEUTICALS LTD-EPF-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য BEACON PHARMACEUTICALS LTD-EPF-কে অর্থদন্ডে দণ্ডিত 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 PHARMACEUTICALS LTD-EPF-কে মোট ১.৪৫ (এক দশমিক পয়তাল্লিশ) কোটি টাকা অর্থদন্ডে দণ্ডিত 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,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

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