

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৯৪

তারিখঃ জানুয়ারি ৩০, ২০২৫

Beacon Pharmaceuticals Ltd-EGF

(BO ID # 1601880065365037)

Beacon Business centre,

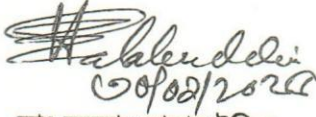
9/A, Tayenbee circular Road

motijheel C/A, Dhaka- 1000

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৯৩ তারিখঃ জানুয়ারি ৩০, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের 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	Mohammd Ekhlasur 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	1601760000026212	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	UCB Stock Brokerage Limited	764065	661581	1425646	68371890	2.09%
8	11771	Md. Akter Hosen	1205590068957614	UCB Stock Brokerage Limited	686450	532596	1219046	68371890	1.78%
9	11755	Risana Karim	1205590043493921	UCB 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 Ekhlashur 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	11775	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	680450	552590	1219040	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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Effects of "ORIONINFU" at DSE (Both Public Market and Block Market) by Md. Sohail Alam, Mohammad Ebadul Karim and their associates:

Date	Buy		Sell		Cost of shares sold		Stock Position		Comparison with the Market	
	Qty.	Price	Qty.	Price	Amount	Price (W.Avg.)	Amount	Price (W.Avg.)	Mkt Price at DSE	Client Trade (%)
21-06-22	10000	809307.80	0	0.00	0.00	0.00	10000	809307.80	82.10	2.99%
22-06-22	3100	82.28	0	0.00	0.00	0.00	10000	809307.80	82.10	2.99%
23-06-22	153916	85.81	13207339.30	8000	8461	676900.00	153916	13588097.34	85.30	1.75%
26-06-22	109934	84.55	925185.10	0	0.00	0.00	230949	22883282.44	84.40	22.35%
27-06-22	82771	84.09	6966530.60	0	0.00	0.00	135884	29843813.04	84.20	47.60%
28-06-22	72839	85.05	619466.90	0	0.00	0.00	279044	3603879.94	85.10	60.91%
29-06-22	106779	86.86	9274727.40	25868	87.12	2253559.00	770145	43107439.63	87.20	26.10%
30-06-22	186778	87.42	16321911.60	39485	86.40	3411615.50	465637	56041481.93	87.30	17.22%
03-07-22	74735	87.46	6536657.20	23664	86.44	2045569.60	329656	60542465.03	87.60	48.58%
04-07-22	102145	89.48	919429.90	149264	89.00	1328333.00	6646	56776309.63	89.80	29.85%
05-07-22	21917	93.30	2044772.20	27938	92.57	2586117.60	847885	7476650.70	93.40	42.29%
06-07-22	301429	94.20	28394845.40	16437	94.91	1560100.50	8975	1475286.03	94.75	31.69%
07-07-22	213877	97.15	20777769.50	338295	95.85	3242529.40	9093	91697034.05	95.00	18.42%
14-07-22	74065	95.64	7083893.00	69800	96.02	6701960.00	9125	92411637.88	95.70	43.05%
17-07-22	64963	96.92	6296485.70	33000	97.65	3222460.00	9159	92411637.88	95.70	27.71%
18-07-22	142851	99.78	14254513.00	136530	100.21	13681929.30	9258	97299445.79	100.20	12.76%
19-07-22	75000	98.40	7380150.00	2951	99.30	293034.00	9297	97299445.79	100.20	20.20%
20-07-22	26110	105.05	274894.90	73000	103.01	751978.20	9324	1004405255.38	98.40	12.53%
21-07-22	171573	106.98	1835451.60	84000	106.49	8944879.30	9513	110705320.37	105.50	6.06%
24-07-22	572229	110.20	6306558.60	102331	109.89	11244736.50	10010	110705320.37	107.10	21.28%
25-07-22	93666	107.45	10064063.70	166557	106.70	17771034.80	10080	163232818.09	108.30	31.20%
26-07-22	235741	108.88	25667106.20	159429	108.90	1736259.40	10160	15648594.68	107.80	24.60%
27-07-22	205200	107.18	21993050.00	39294	108.67	427072.40	10222	184294887.04	108.90	37.81%
28-07-22	60554	104.78	6345076.80	10004	104.70	1047418.80	10230	184294887.04	106.80	30.44%
31-07-22	49416	112.99	5583433.20	106421	112.42	11963994.50	10258	184294887.04	104.70	20.99%
01-08-22	439225	118.04	51847012.90	219940	118.68	26107709.50	10567	184294887.04	117.70	9.47%
02-08-22	257857	116.72	30093832.00	177091	117.85	20871052.50	10688	224072685.14	117.10	33.00%
03-08-22	132844	123.23	16370777.80	286505	124.12	35560660.80	10785	209543624.49	117.10	33.00%
04-08-22	210769	130.99	27608106.50	218069	131.41	28655884.80	11012	213139015.56	125.50	25.86%
07-08-22	538022	130.84	70393999.40	239986	131.49	31556465.60	11482	256025192.77	132.30	31.65%
08-08-22	219577	132.83	29166915.40	360736	132.81	47910937.10	11625	243256651.64	131.40	62.01%
10-08-22	272843	134.02	36566062.60	61084	134.00	8318986.30	11830	272477062.65	133.70	44.93%
11-08-22	277252	130.64	36228000.30	144237	127.09	18331797.50	11963	272477062.65	130.50	38.88%
14-08-22	139669	129.37	18068848.70	20000	130.30	2606000.00	12016	291443121.34	129.10	31.14%
16-08-22	0	0.00	0.00	60000	131.92	7915150.00	12016	307467122.26	129.10	28.63%
17-08-22	80673	144.63	1166792.40	75258	142.71	1073981.60	12092	302467122.26	145.80	4.43%
21-08-22	9652	152.51	1471997.70	69000	150.32	10371897.30	12104	295587105.68	158.10	5.74%
22-08-22	73050	166.25	12144771.50	96500	168.99	15293767.50	12236	296658586.85	173.90	11.96%
23-08-22	6660	185.83	1237596.00	31000	186.23	5773120.00	12253	294097732.27	191.20	3.50%
24-08-22	167707	196.11	32889463.20	138833	198.73	27589676.70	12734	309308725.67	200.00	18.21%
25-08-22	8513	212.50	1809017.00	85500	210.02	17956893.60	12763	300205065.61	220.00	10.47%
28-08-22	375975	233.09	87653584.00	98529	203.30	20031125.80	14217	373833312.75	231.10	24.30%
29-08-22	81810	218.11	17843628.50	484906	216.23	10485070.00	14446	321627999.07	244.20	41.27%
30-08-22	265494	257.05	68245550.90	611630	227.59	13920237.00	15645	294181234.88	265.50	68.84%
31-08-22	439952	287.18	126346452.30	11000	287.72	3164950.00	18124	418534020.74	288.70	35.48%
01-09-22	348896	303.23	105794124.80	297573	283.55	8385991.40	19725	46599881.94	310.20	30.83%
04-09-22	377275	312.66	117958124.20	417718	284.29	118752205.60	21315	494913278.86	313.60	40.91%
05-09-22	58400	324.09	18926942.40	19400	314.17	6094990.00	21587	50962391.61	326.40	9.39%

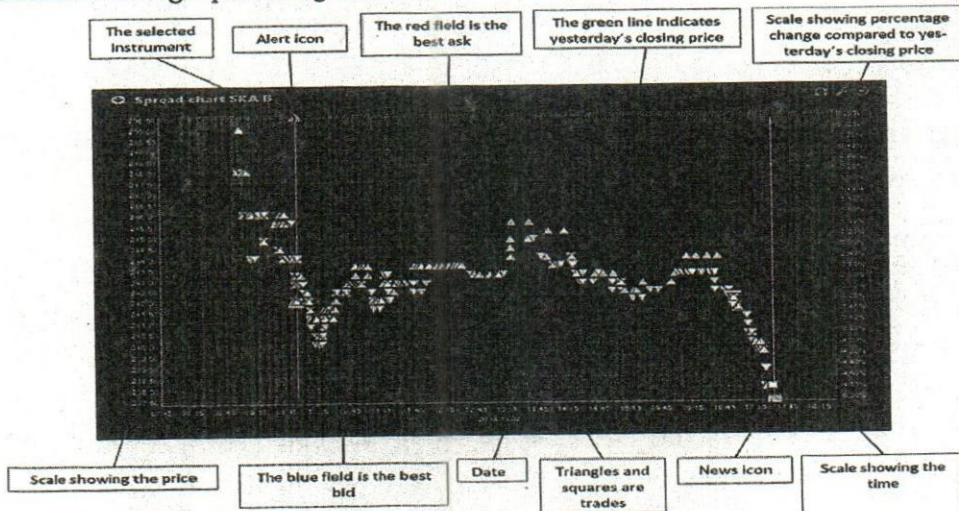
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06-09-22	125888	350.89	44173280.70	255485	304.14	77703854.30	222.70	56897213.20	2231353	222.70	490928459.11	1155440	354.40	6.58%	10.50%	22.11%	35.01%
07-09-22	274750	378.22	103914811.10	150000	329.58	49437125.80	239.75	35962803.82	2356103	239.75	564880466.39	1490653	385.40	8.75%	18.43%	10.06%	28.49%
08-09-22	176052	398.80	70209947.60	515990	356.87	184142970.00	250.81	129415577.92	2016165	250.81	505674836.07	1455825	419.00	8.72%	12.09%	35.44%	47.54%
11-09-22	607324	426.84	259190273.30	298491	385.72	115132972.70	291.56	87026876.82	2324898	291.56	677038232.55	1357765	407.50	-2.72%	44.77%	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	69480	467.40	32474812.00	9374	455.76	4272282.00	313.33	2937114.67	1809857	313.33	567074626.65	464646	467.40	8.75%	14.95%	2.02%	16.97%
18-09-24	110440	502.85	28039117.50	100200	450.45	70500220.00	311.85	20214056.33	1715017	311.85	566228780.15	1437768	469.70	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:



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

△ 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.

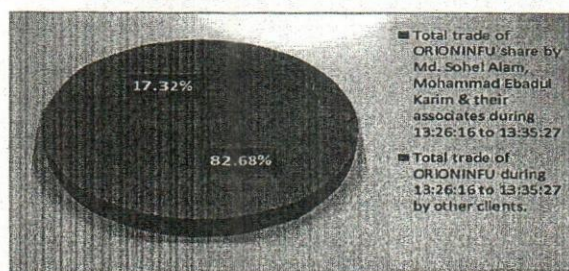
**BOIDs: 1601880043377493; 1203710046187231; 1601880046187231; 1203710043493921;
1205590043493921; 1205590075153283; 1203710064190682; 1605170064190682;
1601880064821881; 1601880065365037; 1203710048667734; 1203710075253110
(Combined)**

Date: 28-08-2022



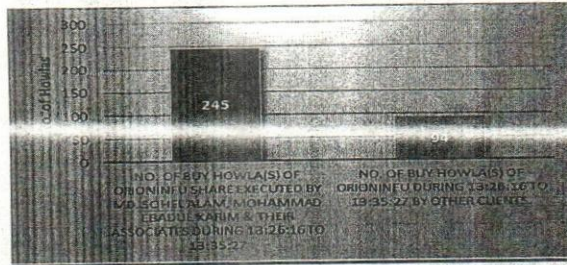
It was observed in the above graph that on 28-08-2022, total number of trades of **ORIONINFU** in the market was 3303, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 525 which is approximately 15.89% of the total number of trades in the market. 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.



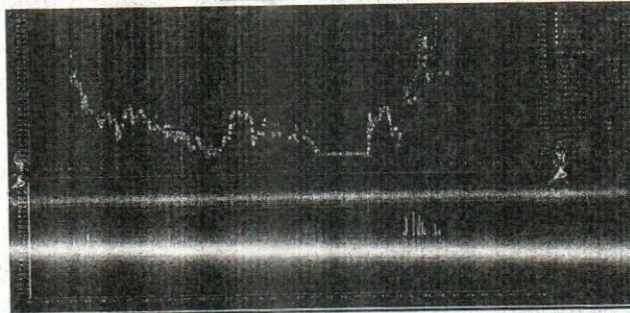
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 245 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 339 as shown in the following Bar Chart.



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

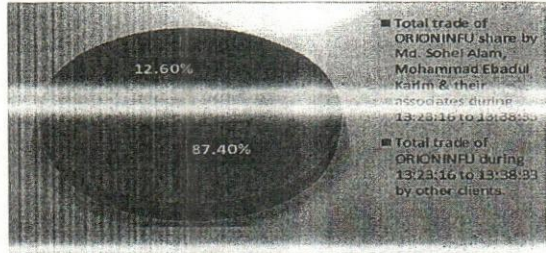


It was observed in the above graph that on 04-09-2022, total number of trades of ORIONINFU in the market was 4000, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 649 which is approximately 16.23% of the total number of trades in the market. 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.

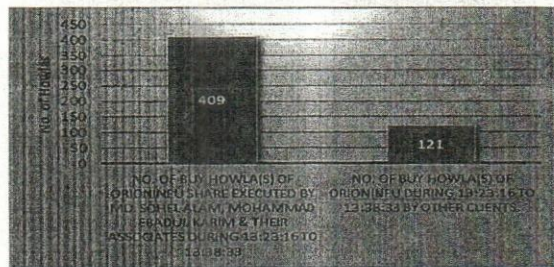
On 04-09-2022, trading of ORIONINFU share was started at Tk. 324.00 which is Tk. 13.70 more than the YCP of Tk. 310.30. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:23:16 at price Tk. 292.50 and induced the same to rise to Tk. 330.00 up to 13:38:33. 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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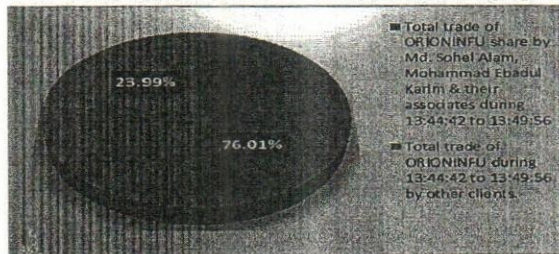


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 409 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 530 as shown in the following Bar Chart.



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.

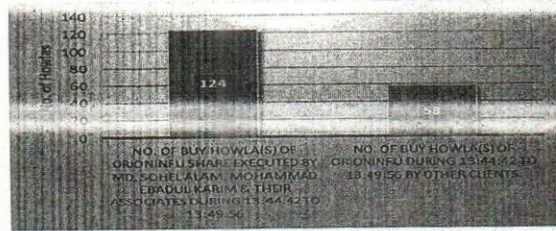
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:44:42 at price Tk. 312.20 and induced the same to rise to Tk. 334.90 up to 13:49:56. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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.

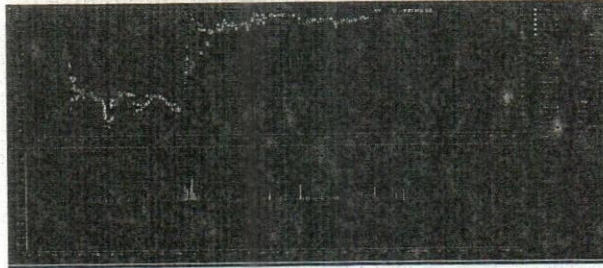
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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 76.01% of the total trades of ORIONINFU shares by executing 124 of total 182 howlas from 13:44:42 to 13:49:56 on 04-09-2022. 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.

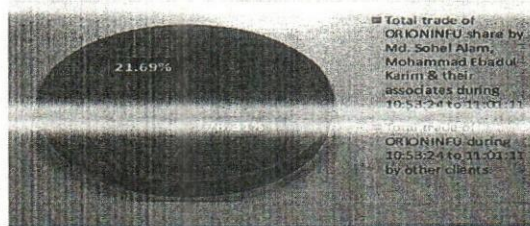
Date: 07-09-2022



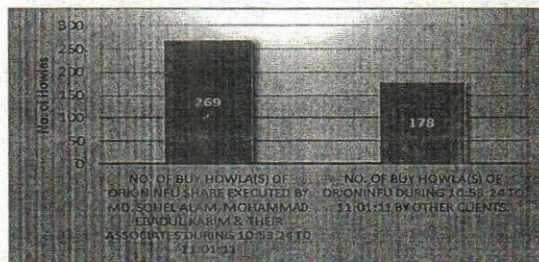
It was observed in the above graph that on 07-09-2022, total number of trades of ORIONINFU in the market was 2876, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 440 which is approximately 15.30% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 809,923 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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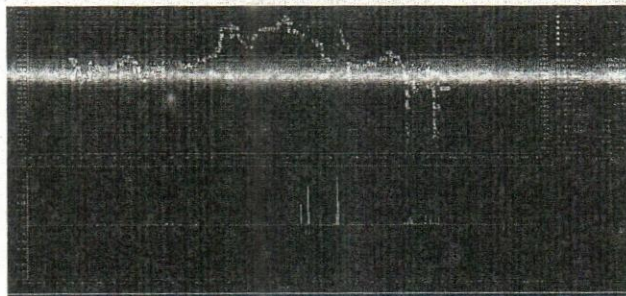


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 269 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 447 as shown in the following Bar Chart.



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

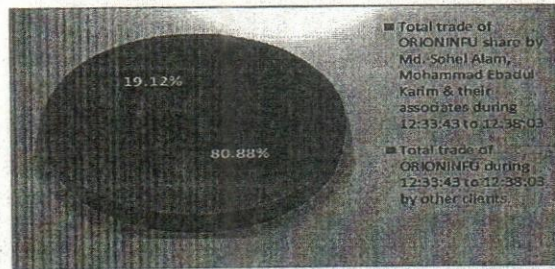


It was observed in the above graph that on 11-09-2022, total number of trades of ORIONINFU in the market was 4040, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 1067 which is approximately 26.41% of the total number of trades in the market. 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.

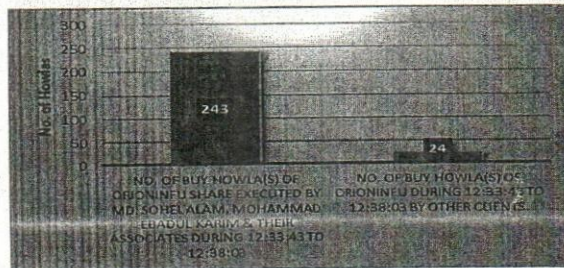
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On 11-09-2022, trading of ORIONINFU share was started at Tk. 420.00 which is Tk. 1.00 more than the YCP of Tk. 419.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 12:33:43 at price Tk. 415.40 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, 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.

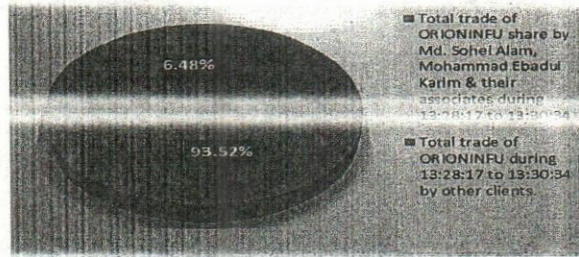


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 80.88% of the total trades of ORIONINFU shares by executing 243 of total 267 howlas from 12:33:43 to 12:38:03 on 11-09-2022. From 12:33:43 to 12:38:03, Md. Sohel Alam, Mohammad Ebadul 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.

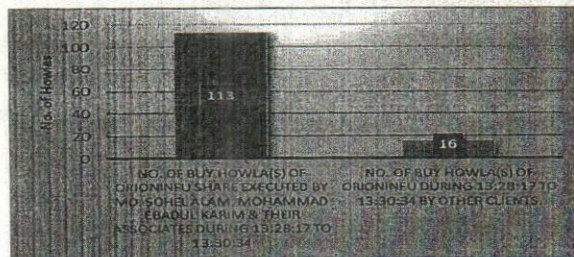
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:17 at price Tk. 392.10 and induced the same to rise to Tk. 422.50 up to 13:30:34. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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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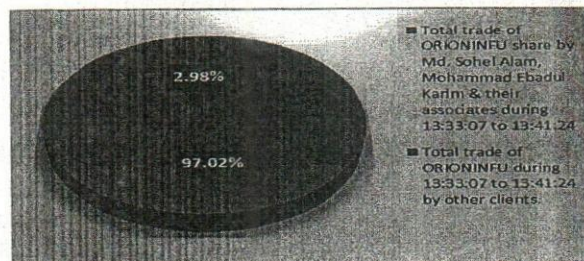


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 113 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 129 as shown in the following Bar Chart.



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.

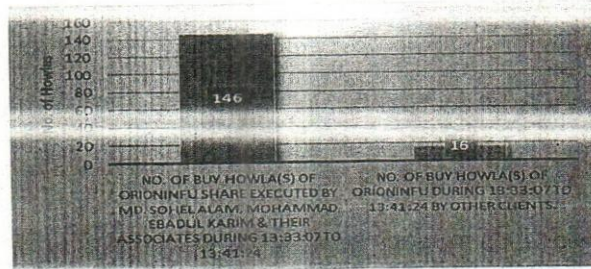
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:07 at price Tk. 406.40 and induced the same to rise to Tk. 417.80 up to 13:41:24. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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.

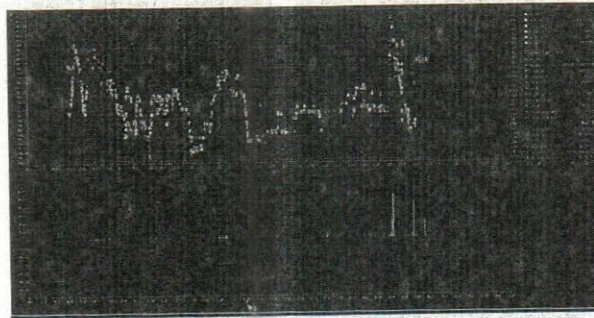
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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 97.02% of the total trades of ORIONINFU shares by executing 146 of total 162 howlas from 13:33:07 to 13:41:24 on 11-09-2022. 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

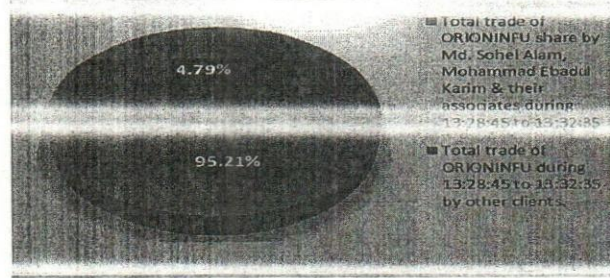


It was observed in the above graph that on 12-09-2022, total number of trades of ORIONINFU in the market was 2711, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 465 which is approximately 17.15% of the total number of trades in the market. 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.

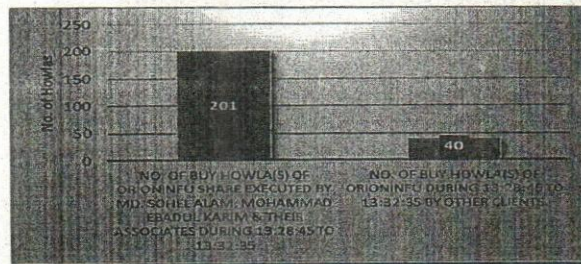
On 12-09-2022, trading of ORIONINFU share was started at Tk. 400.00 which is Tk. 7.60 less than the YCP of Tk. 407.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:45 at price Tk. 390.80 and induced the same to rise to Tk. 410.00 up to 13:32:35. 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.

AS

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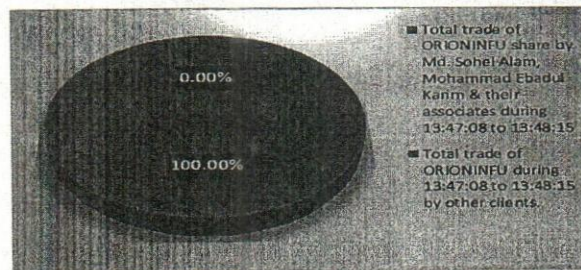


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 201 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 241 as shown in the following Bar Chart.



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.

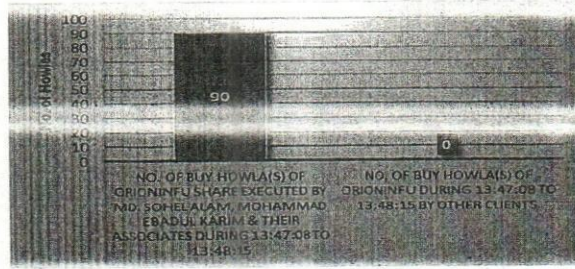
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:47:08 at price Tk. 390.00 and induced the same to rise to Tk. 404.00 up to 13:48:15. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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.

A

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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 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.

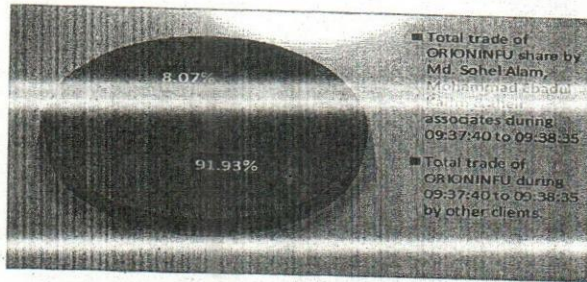
Date: 21-09-2022



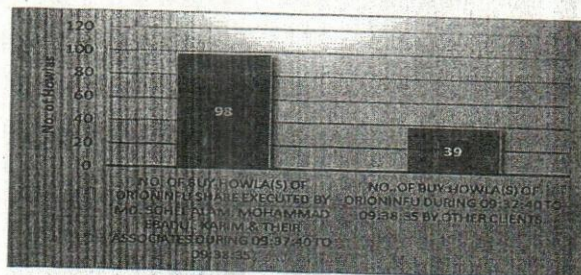
It was observed in the above graph that on 21-09-2022, total number of trades of ORIONINFU in the market was 3376, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 530 which is approximately 15.70% of the total number of trades in the market. 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.

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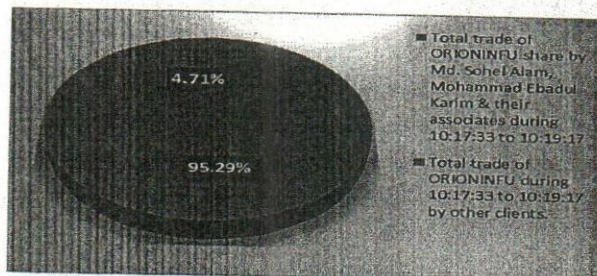


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 98 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 137 as shown in the following Bar Chart.



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.

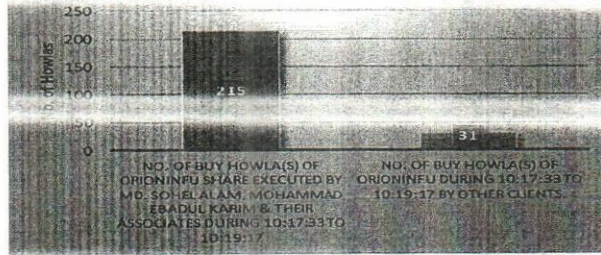
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:17:33 at price Tk. 595.00 and induced the same to rise to Tk. 616.00 up to 10:19:17. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.29% 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 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

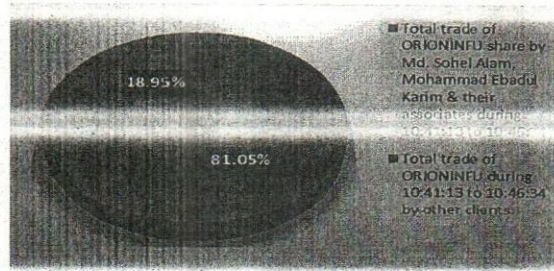


It was observed in the above graph that on 25-09-2022, total number of trades of ORIONINFU in the market was 2567, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 715 which is approximately 27.85% of the total number of trades in the market. 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.

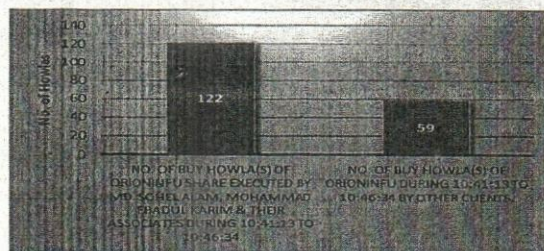
On 25-09-2022, trading of ORIONINFU share was started at Tk. 577.00 which is Tk. 1.40 more than the YCP of Tk. 575.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:41:13 at price Tk. 567.90 and induced the same to rise to Tk. 575.00 up to 10:46:34. 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.

CA

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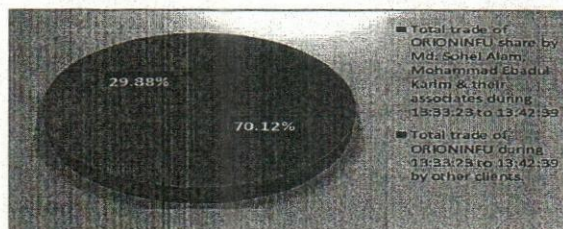


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 122 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 181 as shown in the following Bar Chart.



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.

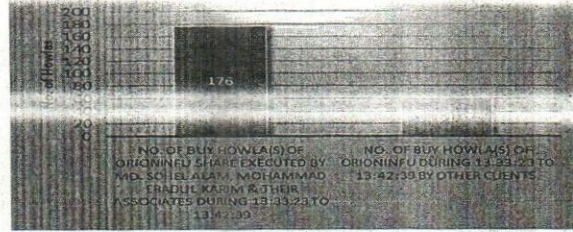
Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:23 at price Tk. 537.50 and induced the same to rise to Tk. 573.00 up to 13:42:39. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates 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.

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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.

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		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
317300	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.

(Signature)

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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 Stock accounts in order to create the appearance of active trading and raising of price of the said share.

Contravention(s)-1:

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.

Observation -2:

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	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	M.D. SOHEL ALAM	23176	MTB Securities Limited	859852.00	4.22%	959852.00	4.71%	1017339.00	5.00%	937339.00	4.60%
2	M OHAMMAD EBADUL KARM	3371	AB Securities Limited	658263.00	3.23%	543263.00	2.67%	646263.00	3.17%	648946.00	3.19%
3	M OHAMMAD EBADUL KARM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
4	RIBANA KARM	3214	AB Securities Limited	66784.00	0.33%	184124.00	0.90%	142140.00	0.70%	195061.00	0.96%
5	RIBANA KARM	11735	UCB Stock Brokerage Limited	40000.00	0.20%	40000.00	0.20%	40000.00	0.20%	20000.00	0.10%
6	RIBANA KARM	11788	UCB Stock Brokerage Limited	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%
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%
9	BEACON PHARMACEUTICALS LTD-EFF	22936	MTB Securities Limited	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%
10	BEACON PHARMACEUTICALS LTD-EFF	22985	MTB Securities Limited	45000.00	0.22%	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%
12	NURUNNAHAR KARM	5674	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
Total				2128736.00	10.55%	2087577.00	10.25%	2298336.00	11.39%	2431351.00	11.94%
Total No. of Outstanding Securities				20359760	10.55%	2087577.00	10.25%	2298336.00	11.39%	2431351.00	11.94%

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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 - 2:

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 প্রণীত 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 - 2:

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-EGF:

i. Individual Trade Patterns of Beacon Pharmaceuticals Ltd-EGF (Only Public Market):

Date	Code # 22985				Total					
	BO ID # 1601880065365037									
	BEACON PHARMACEUTICALS LTD-EGF									
	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	45000	93.62	0	0.00	45000	93.62	4212940.00	0	0.00	0.00
08-08-2022	2137	131.78	0	0.00	2137	131.78	281621.50	0	0.00	0.00
31-08-2022	15500	288.70	0	0.00	15500	288.70	4474850.00	0	0.00	0.00
12-09-2022	20000	391.69	0	0.00	20000	391.69	7833717.50	0	0.00	0.00
13-09-2022	18007	387.71	0	0.00	18007	387.71	6981415.70	0	0.00	0.00
Total	100644		0		100644			0		

ii. Effects of 'ORIONINFU' at DSE by Beacon Pharmaceuticals Ltd-EGF (Public and Block Market):

	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 (%)
Opening Balance										0	0.00	0.00						
06-07-2022	45000	93.62	4212940.00	0	0.00	0.00	0	0.00	0.00	45000	93.62	4212940.00	1725375	95.00	1.71%	2.61%	0.00%	2.61%
08-08-2022	2137	131.78	281621.50	0	0.00	0.00	0	0.00	0.00	47137	95.35	4494561.50	1291450	133.90	1.90%	0.17%	0.00%	0.17%
28-08-2022	0	0.00	0.00	15000	205.00	3075000.00	0	95.35	1430265.45	32137	95.35	3064296.05	1952979	231.10	5.05%	0.00%	0.77%	0.77%
29-08-2022	14500	211.00	3059500.00	0	0.00	0.00	0	0.00	0.00	46637	131.31	6123796.05	1373157	244.20	5.67%	1.06%	0.00%	1.06%
30-08-2022	0	0.00	0.00	20000	226.20	4524000.00	0	131.31	2626153.50	26637	131.31	3497642.55	1274144	265.50	8.72%	0.00%	1.57%	1.57%
31-08-2022	15500	288.70	4474850.00	0	0.00	0.00	0	0.00	0.00	42137	189.20	7972492.55	1270924	288.70	8.74%	1.22%	0.00%	1.22%
11-09-2022	0	0.00	0.00	40000	385.00	15400000.00	0	189.20	7568163.42	2137	189.20	404329.13	1357765	407.60	-2.72%	0.00%	2.95%	2.95%
12-09-2022	20000	391.69	7833717.50	0	0.00	0.00	0	0.00	0.00	22137	372.14	8238046.63	675535	400.80	-1.67%	2.96%	0.00%	2.96%
13-09-2022	18007	387.71	6981415.70	0	0.00	0.00	0	0.00	0.00	40144	379.12	15219462.33	805037	395.30	-1.37%	2.24%	0.00%	2.24%
Total	115144	233.13	26844044.70	75000	306.65	22999000.00	0	154.99	11624582.37	40144	379.12	15219462.33						

Summary of the trade by Beacon Pharmaceuticals Ltd-EGF:

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
14500	211.00	3059500.00	75000	306.65	22999000.00	115144	233.13	26844044.70	75000	306.65	22999000.00	154.99	11624582.37	40144	379.12	15219462.33

(Handwritten Signature)

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iii. Gain/Loss by Beacon Pharmaceuticals Ltd-EGF from 21.06.2022 to 12.10.2022:

Realized Capital gain(loss)per unit	151.66	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	97.85%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	11,374,417.63	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	540.48	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	142.56%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	21,696,960.07	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-EGF-কে মার্চ ২৭, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে Beacon Pharmaceuticals Ltd-EGF এর পক্ষে Mr. Md. Al-Masum (on behalf) শুনানীতে উপস্থিত হয়ে মার্চ ২০, ২০২৩ তারিখের BPL/CA/BSEC/SHOWCAUSE-REPLY/2023/MAR/03 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. 1601880065365037 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-EGF-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, 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-EGF-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Beacon Pharmaceuticals Ltd-EGF উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উন্নয়নমূলক সংশোধন) শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছেন;

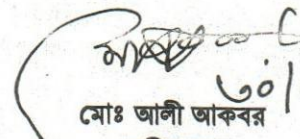
যেহেতু, Beacon Pharmaceuticals Ltd-EGF -এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Beacon Pharmaceuticals Ltd-EGF-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-EGF-কে মোট ১.০০ (এক) 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,


৩০/০২/২০২০
মোঃ আলী আকবর
কমিশনার

বিতরণ:

- 1) **Beacon Pharmaceuticals Ltd-EGF**
(BO ID # 1601880065365037)
Beacon Business centre
9/A, Tayenbee circular Road
motijheel C/A, Dhaka- 1000