

evsj v` k wmwKDwi wUR A`vU G. tPA Kwgkb  
Rxeb exgv UvI qvi (14,15,16 I 20 Zj v)  
10, w` j Kkv ev/G  
XvKv-1000

bs-GmBwm/Gbt`dvm`g>U/1060/2012/21

Zwi Lt 27 Rvbgvi x 2013

International Leasing Securities Limited  
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welq: Av` k|

Kwgk`bi 27 Rvbgvi x 2013 Zwi t`Li Av` k bs-GmBwm/Gbt`dvm`g>U/1060/2012/20 Gi mZ`wqZ  
Abvj wC Avcbvi AeMwZ I c`qvrBxq e`e`v Mh`tbi Rb` GZ` t`stM mshy` Kiv ntj v|

evsj v` k wmwKDwi wUR A`vU G. tPA Kwgk`bi c`t`|

gxi tgvkvi i d tnv`mb tP`Saj x  
cwi Pvj K

wEZi bt

c`avb wbe`fx KgRZP, XvKv óK G. tPA wj wgt`UW

AeMwZi Rb` Abvj wC:

- 1| wbe`fx cwi Pvj K, AvBb, weGmBwm
- 2| wbe`fx cwi Pvj K, GgAvBGm, weGmBwm
- 3| wbe`fx cwi Pvj K, GmAvi AvB, weGmBwm
- 4| tPqvi g`vb g`tnv` t`qi `Bi, weGmBwm

evsj vt` k wmkDwi wJR A`vU G. tPÄ Kwgkb  
 Rxeb exgv Uvl qvi (14,15,16 I 20 Zj v)  
 10, w` j Kkv ev/G  
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thtnZi Kwgkb, International Leasing Securities Limited (wGmB m` m` bs-09) tK Zvi Avte` bmtg, wbaWi Z kZPaxtb wmkDwi wJR mq weµq KgRvE` cwi Pvj bv Kivi Rb` wmkDwi wJR I G. tPÄ Kwgkb (AZ:ci UKwgkb0 etj Dij - wLZ) wmkDwi wJR I G. tPÄ Kwgkb AvBb, 1993 (1993 mthi 15 bs AvBb) Gi 10(1) G c0 E` tlgZvetj wmkDwi wJR I G. tPÄ Kwgkb (÷K-wWj vi, ÷K-tetKvi I Abtjgm Z c0Zibwa) weagjv, 2000 Gi wea 5(5) mn cWZ ÷KtetKvi/wWj vi ti wRt0kb mWJdtkU c0 vb Kti t0;

thtnZi an inspection on International Leasing Securities Limited was conducted by the Commission vide Commission’s Order No. SEC/SRI/INS/DSE-MEM/2010/380 dated June 12, 2012. From the inspection report it appears, among others, that:

“In case of the following clients, the said stock-broker extended credit facilities to purchase shares of the listed “Z” and “N” category companies (Non-Marginable Securities):

- (i) Mr/ Mrs. Momtaz Begum (Client Code # D0008, BO ID- 1204220002957883)

Date	Transaction type	Script name	Qty.	Rate	Amount	Broker’s Comm.	Ledger Balance	REMARKS
25/06/12	Opening Ledger Balance						-15,741,182.97	The said stock-broker provided loan facilities to purchase shares of Bangladesh Submarine Cable Company Limited (BSCCL) in between 1st to 30th trading day after listing of the said company i.e. starting from 14.06.2012.
	Sale	GP	6200	200.3548	1,242,200.00	2,484.40	-14,501,467.37	
	Sale	SIBL	100000	18.6103	1,861,025.00	3,722.05	-12,644,164.42	
	Sale	TITASGAS	11000	66.0000	726,000.00	1,452.00	-11,919,616.42	
	Buy	BSCCL	8000	54.6588	437,270.00	874.54	-12,357,760.96	
	Buy	CITYBANK	25000	28.7586	718,965.00	1,437.93	-13,078,163.89	
	Buy	GP	10000	197.9520	1,979,520.00	3,959.04	-15,061,642.93	
	Buy	TITASGAS	10000	65.0000	650,000.00	1,300.00	-15,712,942.93	
	Closing Balance						-15,712,942.93	

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(ii) Mr./ Mrs. Kamrozzaman (Client Code # D5663, BO ID- 1204220045133286)

Date	Transaction type	Script name	Qty.	Rate	Amount	Broker's Comm.	Ledger Balance	REMARKS
03/06/12	Opening Ledger Balance						641.89	The said stock-broker provided loan facilities to purchase shares of Lafarge Surma Cement ("Z" category/Non-Marginable Securities).
	Buy	LAFSUR CEML	2500	41.8000	104,500.00	418.00	-104,276.11	
	Closing Balance						-104,276.11	

(iii) Mr./ Mrs. Kamrozzaman (Client Code # D5663, BO ID- 1204220045133286)

Date	Transaction type	Script name	Qty.	Rate	Amount	Broker's Comm.	Ledger Balance	REMARKS
06/06/12	Opening Ledger Balance						7,269.69	The said stock-broker provided loan facilities to purchase shares of Lafarge Surma Cement ("Z" category/Non-Marginable Securities).
	Sale	ILFSL	1000	31.3000	31,300.00	125.20	38,444.49	
	Buy	LAFSUR CEML	1000	42.0000	42,000.00	168.00	-3,723.51	
	Closing Balance						-3,723.51	

(iv) Mr./ Mrs. Nawshin Sadeque (Client Code # D5650, BO ID- 1204220044980805)

Date	Transaction type	Script name	Qty.	Rate	Amount	Broker's Comm.	Ledger Balance	REMARKS
10/06/12	Opening Ledger Balance						1,198.57	The said stock-broker provided loan facilities to purchase shares of aamra technologies limited (AAMRATECH) in between 1st to 30th trading day after listing of the said company i.e. starting from 04.07.2012.
	Buy	AAMRAT ECH	2000	20.1000	40,200.00	100.50	-39,101,93	
	Closing Balance						-39,101,93	

**Contravention:** Through the aforesaid activities International Leasing Securities Limited violated SEC Directive No. SEC/CMRRCD/2001-43/169 dated October 01, 2009."

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thtnZi Kugkb Dctiwj wZ AvBb cwi cvj tb e`\_Zvi `i`b International Leasing Securities Limited Gi eivei GKwJ show-cause-cum-hearing notice mF bs-SEC/Enforcement/1061/2010/449 Zwi L 7 btfaf 2012 tclY Kti Ges 19 btfaf 2012 Zwi tL kpbvxi w b avh`Kti Ges avh`KZ Zwi tL International Leasing Securities Limited Gi Chief Operating Officer Rbve tgv: ugvpb Kuei, HO Rbve tgv: tgvmtj g Dfxb Ges Compliance Rbve bRgyn mwikE Dcir`Z ntq& 18 btfaf 2012 Zwi L Gi wPwI gva`tg tKv`ubxi wj wLZ e`e` wLj Kti b| hvfZ Ab`vfb`i gta`, wbtb`<sup>3</sup> wLq, wj i Dfj wAvfQ:-

International Leasing Securities Limited submitted a written explanation at the time of hearing stating, among others, the following:-

“With reference to your letter no SEC/Enforcement/1061/2010/449 dated November 07, 2012 on the above mentioned subject, we have made inadvertent mistakes for providing loan facility to some of our clients into “Z” and ‘N’ categories of shares. We hereby apologize for the mentioned activities and we will be more cautious in future to prevent the said activities.

In this regard, we would like to inform you that we have identified this issue on the trade date and inquired the traders for violating the above said rules.

**Trader’s view:**

**(i) Mrs. Momtaz Begum (Client Code no. D0008 NO ID – 12042200029578830) dated June 25, 2012:**

The trader informed that the client’s equity on the trade date of June 25, 2012 was Tk.37.89 million and loan balance was Tk.15.71 million so after deducting the purchased amount of Tk.437,271 (8000 shares) of Bangladesh Submarine Cable Company Limited (BSCCL), client’s loan ratio will be 1:0.42. Thus no loan was provided to the clients for purchasing BSCCL shares. However, the trader was subsequently warned for not purchasing any non-marginable shares in the margin account to comply with the above mentioned directive and he asked for apology.

**(ii) Mr. Kamrozzaman (Client Code no. D5663, BO ID – 1204220045133286) dated June 03, 2012:**

The client bought 2500 Lafarge Surma Cement amounting to Tk.104,918 on the condition that he will deposit the amount in the account and we received the amount on next day (June 04, 2012) amounting to Tk.100,000 so ledger balance went to positive on June 04, 2012. However, the trader asked for apology for the above mentioned mistake.

Art`k**(iii) Mr. Kamrozzaman (Client Code no. D5663, BO ID – 1204220045133286) dated June 06, 2012:**

The trader admitted that he made this mistake with the pressure of client. It may be mentioned here that the client was physically present at the time of trade and requested the concerned trader to buy Lafarge Surma Cement Ltd. and said that he had enough fund in the client account. On the basis of verbal request, the trader bought the shares but subsequently checked and found that there was no matured fund in the portfolio. Thus, he sold all matured shares with the permission of clients but there was a shortfall of Tk.3,723 which was subsequently adjusted on June 17, 2012.

We had given show cause notice to the concerned trader for the above mentioned trade and providing loan facility to the clients for Z category of shares. He admitted his mistakes and asked for apology and said that it will not happen in next time.

**(iv) Ms. Nawshin Sadeque (Client Code no. D5650 ,BO ID – 1204220044980805) dated July 10, 2012:**

The client asked the trader to buy AAMRATECH in the mentioned code on condition that she will deposit the amount in the code but failed to deposit on the same date but subsequently she deposited the amount on July 16, 2012 to adjust the loan fully. It may be mentioned here that the mentioned code is trading as direct trading account and no margin is being provided in this code.

**ILSL's Action**

1. In this regard we issued a show cause letter to the respective traders. Upon investigation and their clarification on this issue we issued a warning letter in favour of Mr. Md. Moslem Uddin, Manager – Trade, Mr. Md. Jahangir Kabir, Junior Executive –Trade & Mr. Md. Sabbir Ahmed Junior Executive – Trade for violating **SEC Directive No. SEC/CMRRCD/2001-43/169 dated October 01, 2009**
2. We warned the traders to be more careful in their trading activities in future to comply with trade related rules and regulations set by SEC and to be more cautious during the trade time.
3. To avoid the purchasing of non-marginable shares in the margin code, we have given clear instruction to the traders to view the portfolio status before executing the order of the clients.
4. We are organizing in-house training program regularly for the traders regarding the trade related rules and regulations so that they can be more knowledgeable and complied with the rules and regulation set by the regulators.
5. We have decided to suspend the purchasing of shares in the DSE MSA Plus where category has been changed or new IPO shares upto the date of open for trading in the margin accounts to

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avoid the purchasing of non-marginable shares in the margin account. Our compliance department will monitor the matter closely at the trade time.

International Leasing Securities Ltd is fully owned subsidiary company of International Leasing and Financial Services Limited –a leading financial institution in Bangladesh. Since inception in April 2008 our main objective is to operate our business in a very complied way. ILSL is maintaining top ten positions among all DSE members in terms of turnover. Hence, sometimes it becomes challenging to identify this kinds of problem instantly and also system does not permit us to identify this kind of problem automatically to rectify or take proactive actions.

We hereby sincerely apologize for the above said violations and beg your mercy in this regard.

**We assure that we will be very careful to comply with rules and regulations set by the regulator.”**

thtnZi International Leasing Securities Ltd Gi wj mLZ e³e` t\_tK mý úó cŁxqgvb nq th, International Leasing Securities Ltd `ibvxi tbnUtki AwfthvMmgn `xKvi Kti tQb hv B`QvKZ Ges SEC Directive No. SEC/CMRRCD/2001-43/169 dated October 01, 2009 Gi mý úó jsNb weavq section 22 of the Securities and Exchange Ordinance, 1969 Abhvqx kw` #hvM` Aciva, hv tKvb fvtB ¶lgvthvM` bñ;

thtnZi Kvgkñbi weþPbvq, mmKDwi UR AvBb cwii cij tñ Duj mLZ e`\_Zvi Rb`, Z\_v c¶RevRvti i Dbqñbi cvkvcwk evRvti i ksLj v I `^QZv i ¶vi `¶\_International Leasing Securities Ltd tK Rwi gvbn Kiv c¶qvRb I mgxPxb;

AZGe, thtnZi Kvgkb, Duj mLZ hveZiq weiq weþPbvceR, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) Gi section 22 [hv The Securities and Exchange (Amendment) Act, 2000 Øviv mstkwaz] G cØ È ¶lgZvetj International Leasing Securities Limited Gi Dci 2 (`ß) j ¶ UvKv Rwi gvbn avh` Kij hv AÎ Avt`tki Zwi L nñZ 15 (cñbi) w` tñbi gñ` `evsj vt` k mmKDwi UR A`vÜ G. tPÄ KvgkbØ Gi AbKñj BmjKZ e`vsK WtdU/tc-AW¶i i gva`tg Kvgkñb Rgv Ki tñZ nñe |

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weZi bt  
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