

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৮

তারিখঃ জানুয়ারি ৩০, ২০২৫

Mohammad Ebadul Karim

(BO ID # 1203710046187231, 1601880046187231)

Orion House, 153-154

Tejgaon I/A, Dhaka- 1208

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৭ 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

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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	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	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 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):

Date	Code # 23176				Code #3371				Code # 10310				Code # 3214				Code # 11755				Code # 11788			
	BOID # 1601880043377493				BOID # 1203710046187231				BOID # 1601880046187231				BOID # 1203710043493921				BOID # 1205590043493921				BOID # 1205590075153283			
	MD. SOHEL ALAM				MOHAMMAD EBADUL KARIM				MOHAMMAD EBADUL KARIM				RISANA KARIM				RISANA KARIM				RISANA KARIM			
	MTB Securities Limited				AB Securities Limited				MTB Securities Limited				AB Securities Limited				UCB Stock Brokerage Limited				UCB Stock Brokerage Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
21-06-22	0	0.00	0	0.00	10000	80.93	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-06-22	0	0.00	0	0.00	3100	82.28	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-06-22	141783	85.87	0	0.00	12133	85.04	8000	84.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-06-22	60062	84.63	0	0.00	49872	84.45	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-06-22	0	0.00	0	0.00	82771	84.09	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-06-22	0	0.00	0	0.00	72839	85.05	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-06-22	32623	87.54	0	0.00	74156	86.56	25868	87.12	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-06-22	0	0.00	22385	86.70	186728	87.42	100	87.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-07-22	3000	86.20	0	0.00	71735	87.52	23664	86.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-07-22	101000	89.50	0	0.00	1145	87.20	129264	89.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-07-22	0	0.00	0	0.00	179157	93.42	27938	92.57	0	0.00	0	0.00	0	0.00	0	0.00	40000	92.78	0	0.00	0	0.00	0	0.00
06-07-22	35000	95.07	0	0.00	16421	93.30	16437	94.91	0	0.00	0	0.00	91273	94.85	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-07-22	0	0.00	262295	95.66	195517	97.19	76000	96.49	0	0.00	0	0.00	18360	96.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-07-22	50000	96.00	0	0.00	19965	94.76	60800	95.97	0	0.00	0	0.00	4100	95.59	9000	96.30	0	0.00	0	0.00	0	0.00	0	0.00
17-07-22	37343	96.98	0	0.00	27620	96.85	5000	98.70	0	0.00	0	0.00	0	0.00	28000	97.46	0	0.00	0	0.00	0	0.00	0	0.00
18-07-22	44689	100.56	0	0.00	80162	99.40	106530	100.06	0	0.00	0	0.00	18000	99.51	30000	100.76	0	0.00	0	0.00	0	0.00	0	0.00
19-07-22	0	0.00	0	0.00	46000	98.23	2951	99.30	0	0.00	0	0.00	19000	98.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-07-22	0	0.00	0	0.00	3000	99.50	30000	102.12	0	0.00	0	0.00	1110	98.61	21000	101.57	22000	106.13	22000	105.61	0	0.00	0	0.00
21-07-22	50343	106.75	0	0.00	118230	107.10	71000	106.36	0	0.00	0	0.00	3000	105.88	13000	107.15	0	0.00	0	0.00	0	0.00	0	0.00
24-07-22	54000	110.77	0	0.00	36331	108.94	41331	110.40	0	0.00	0	0.00	50000	107.22	41000	109.36	20000	108.10	20000	109.90	0	0.00	0	0.00
25-07-22	0	0.00	0	0.00	22791	107.60	52822	107.75	0	0.00	0	0.00	33875	106.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-07-22	143566	109.21	50000	108.54	53175	108.25	0	0.00	0	0.00	0	0.00	0	0.00	38002	109.47	39000	108.51	39000	109.06	0	0.00	0	0.00
27-07-22	0	0.00	0	0.00	0	0.00	25000	109.01	0	0.00	0	0.00	10000	107.31	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-07-22	0	0.00	0	0.00	15550	104.77	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10004	104.70	10004	104.70	0	0.00	0	0.00
31-07-22	0	0.00	0	0.00	16820	108.03	55825	112.11	0	0.00	0	0.00	2600	107.30	20600	113.89	29996	116.26	29996	111.99	0	0.00	0	0.00
01-08-22	376968	118.33	0	0.00	44257	116.18	30500	118.17	0	0.00	0	0.00	18000	116.66	12000	118.23	0	0.00	0	0.00	0	0.00	0	0.00
02-08-22	12416	117.57	0	0.00	52000	116.02	151000	117.90	0	0.00	0	0.00	25441	116.32	26091	117.60	0	0.00	0	0.00	0	0.00	0	0.00
03-08-22	78339	125.07	0	0.00	12505	123.08	179505	125.29	0	0.00	0	0.00	2000	118.25	25000	119.97	40000	119.93	40000	124.35	0	0.00	0	0.00
04-08-22	150700	132.20	0	0.00	0	0.00	31204	130.79	0	0.00	0	0.00	60069	127.95	36865	128.70	0	0.00	0	0.00	0	0.00	0	0.00
07-08-22	0	0.00	180000	131.90	320022	130.42	0	0.00	0	0.00	0	0.00	0	0.00	21986	130.25	38000	129.38	38000	130.28	0	0.00	0	0.00
08-08-22	100000	132.40	0	0.00	0	0.00	115000	132.50	0	0.00	0	0.00	117440	133.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-08-22	57487	133.83	0	0.00	103000	134.65	0	0.00	0	0.00	0	0.00	0	0.00	42084	133.98	20000	133.77	20000	134.03	0	0.00	0	0.00
11-08-22	20000	131.80	0	0.00	26920	130.65	24237	133.01	0	0.00	0	0.00	52921	131.55	0	0.00	0	0.00	20000	130.40	0	0.00	0	0.00
14-08-22	87569	130.10	0	0.00	12100	130.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	40000	127.51	20000	130.30	0	0.00	0	0.00
16-08-22	0	0.00	0	0.00	0	0.00	60000	131.92	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-08-22	1088	143.61	258	144.00	40585	143.57	0	0.00	0	0.00	0	0.00	0	0.00	35000	143.21	39000	145.76	40000	142.26	0	0.00	0	0.00
21-08-22	3352	158.43	0	0.00	0	0.00	69000	150.32	0	0.00	0	0.00	6300	149.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-08-22	10000	173.80	0	0.00	24050	163.29	0	0.00	0	0.00	0	0.00	0	0.00	36000	168.45	39000	166.15	38000	172.54	0	0.00	0	0.00
23-08-22	0	0.00	0	0.00	0	0.00	31000	180.21	0	0.00	0	0.00	3000	185.68	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-08-22	59910	200.30	0	0.00	9797	194.80	103833	198.65	0	0.00	0	0.00	62000	194.87	0	0.00	36000	191.64	35000	198.95	0	0.00	0	0.00
25-08-22	0	0.00	0	0.00	8513	212.50	0	0.00	0	0.00	0	0.00	0	0.00	85000	209.96	0	0.00	500	220.00	0	0.00	0	0.00
28-08-22	145245	230.11	95	222.40	135603	234.07	3134	236.44	0	0.00	0	0.00	75627	236.50	0	0.00	19500	235.25	0	0.00	0	0.00	0	0.00
29-08-22	16557	244.95	0	0.00	0	0.00	71006	237.22	0	0.00	0	0.00	0	0.00	0	0.00	753	236.94	18000	244.40	0	0.00	0	0.00
30-08-22	154909	264.25	0	0.00	0	0.00	36130	256.96	0	0.00	0	0.00	36085	261.12	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-08-22	86000	287.56	0	0.00	280452	287.16	0	0.00	0	0.00	0	0.00	0	0.00	11000	287.72	0	0.00	0	0.00	0	0.00	0	0.00
01-09-22	0	0.00	0	0.00	187743	306.69	0	0.00	0	0.00	0	0.00	9200	307.47	0	0.00	44153	301.02	42753	313.80	83652	295.73	0	0.00
04-09-22	298282	313.18	0	0.00	0	0.00	14410	314.74	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-09-22	40100	325.88	0	0.00	0	0.00	6000	326.25	0	0.00														

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Effects of "MONITOR" at DSE (both Public Market and Block Market) by Md. Sohail Alam, Mohammad Ebadul Karim and their associates:

Date	Buy			Sale			Cost of shares sold			Stock Position			Comparison with the Market		
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg)	Amount	Qty.	Price (W.Avg)	Amount	Trade Close Price at Market	DSE Price at Price Changed	Client Sale (%)	Client Trade (%)
21-06-22	10000	80.93	809307.80	0	0.00	0.00	0.00	0.00	10000	80.93	809307.80	334986	2.11%	2.99%	2.99%
22-06-22	3100	82.28	255059.30	0	0.00	0.00	0.00	0.00	13100	81.25	1064367.10	177510	1.22%	1.75%	1.75%
23-06-22	10000	80.93	809307.80	0	0.00	0.00	0.00	0.00	10000	80.93	809307.80	334986	2.11%	2.99%	2.99%
26-06-22	109934	84.55	9295185.10	0	0.00	0.00	0.00	0.00	22883282.44	85.08	1958879.94	279044	1.07%	0.00%	0.00%
27-06-22	82771	84.09	6960330.60	0	0.00	0.00	0.00	0.00	29843813.04	84.85	255059.30	334986	2.11%	2.99%	2.99%
28-06-22	72839	85.05	6194966.90	0	0.00	0.00	0.00	0.00	36038779.94	84.89	255059.30	334986	2.11%	2.99%	2.99%
29-06-22	106779	86.86	9274727.40	25868	87.12	2253559.00	85.28	2206067.70	505471	85.28	43107439.63	770145	1.07%	0.00%	0.00%
30-06-22	186728	87.42	16324191.60	39485	86.40	3411615.50	85.86	3390149.31	637214	85.86	56041481.93	465637	0.11%	8.48%	48.58%
03-07-22	74735	87.46	653657.20	23664	86.44	2045569.60	86.02	2035674.09	703785	86.02	60542465.03	329656	0.34%	22.67%	29.85%
04-07-22	102145	89.48	9139429.90	149264	89.00	13283933.00	86.46	12905585.31	666666	86.46	56776309.63	594468	2.51%	17.18%	42.29%
05-07-22	219157	93.30	20447721.20	27938	92.57	2586117.60	88.17	2463380.13	847885	88.17	74760650.70	779820	4.01%	28.10%	31.69%
06-07-22	301429	94.20	28394845.40	16437	94.91	1560100.50	89.75	1475286.03	1132877	89.75	101680210.07	172575	1.71%	17.47%	18.42%
07-07-22	213877	97.15	20777629.50	338295	95.85	32424529.40	90.93	30760444.52	1008459	90.93	91697034.05	1281519	1.68%	16.68%	43.05%
14-07-22	74065	95.64	7083893.00	69800	96.02	6701960.00	91.25	6369789.46	1012724	91.25	92411637.58	519240	0.21%	14.26%	27.71%
17-07-22	64963	96.92	6296485.70	33000	97.65	3222460.00	91.59	3022554.85	1044687	91.59	95685568.43	767784	2.51%	8.46%	12.76%
18-07-22	142851	99.78	1425451.30	136530	100.21	13681929.30	92.58	12639573.95	1051008	92.58	97299445.79	1383331	10.33%	9.87%	20.20%
19-07-22	75000	98.40	7380150.00	2951	99.30	293034.30	92.97	274340.40	1123057	92.97	104405255.38	621949	1.80%	12.06%	12.53%
20-07-22	26110	105.05	2742884.90	73000	103.01	7519978.20	93.24	6806507.88	1076167	93.24	100341632.40	1634961	7.22%	1.60%	4.46%
21-07-22	11573	106.98	1235451.60	84000	106.49	8944793.60	95.13	7990828.63	1163740	95.13	110705320.37	1201045	1.52%	14.29%	21.28%
24-07-22	572229	110.20	63060558.60	102331	109.89	11244736.50	100.10	10243060.88	1633638	100.10	163522818.09	2162191	1.12%	26.47%	31.20%
25-07-22	93666	107.45	10064063.70	16657	108.90	17362539.40	101.60	1679732.60	1637059	101.60	166318378.29	1045216	1.02%	22.55%	37.81%
26-07-22	235741	108.88	25667106.20	159429	108.90	17362539.40	101.60	1679732.60	1637059	101.60	166318378.29	1045216	1.02%	22.55%	37.81%
27-07-22	205200	107.18	21930500.00	39294	108.67	4270072.40	102.22	401641.25	1802965	102.22	184294887.04	803203	1.93%	25.55%	30.44%
28-07-22	60554	104.78	6345076.80	10004	104.70	1047418.80	102.30	103419.78	1835515	102.30	189616544.06	336194	1.97%	18.01%	20.99%
31-07-22	49416	112.99	5583433.20	106421	112.42	11963994.50	102.58	10916516.04	1796510	102.58	184283461.22	1645491	1.08%	3.00%	9.47%
01-08-22	439225	118.04	51847012.90	219940	118.68	26102709.50	105.62	2329289.91	2015795	105.62	212901184.21	1612628	1.20%	27.24%	40.88%
02-08-22	327557	116.72	3809333.00	177091	117.85	20871023.00	106.88	18926831.07	2028601	106.88	221971088.14	1317082	0.81%	19.27%	33.00%
03-08-22	132844	123.23	16370777.80	286505	124.12	35506660.80	107.85	30899838.45	1942900	107.85	209543624.49	1621332	7.17%	8.19%	28.86%
04-08-22	210769	130.99	27608106.50	218069	131.41	28655884.80	110.12	24012715.43	1938600	110.12	213139015.56	1354912	5.42%	15.59%	31.65%
07-08-22	538022	130.84	70393999.40	239986	131.49	31564665.60	114.62	27507822.18	2233636	114.62	256025192.77	1254586	0.68%	42.88%	62.01%
08-08-22	219577	132.83	29166915.40	360736	132.81	47910937.10	116.25	41963464.53	2092477	116.25	24355651.64	1291450	1.90%	17.00%	44.93%
10-08-22	277843	134.02	36566062.60	62084	134.00	8318986.30	118.30	7344651.59	2303236	118.30	272477062.65	862063	0.15%	7.20%	38.85%
11-08-22	277252	130.64	36220800.30	144237	127.09	18331797.50	119.63	7344651.59	2303236	119.63	291443121.34	135321	2.39%	20.49%	31.14%
14-08-22	139669	129.37	18068848.70	20000	130.30	2606000.00	120.16	2403117.88	2559520	120.16	307108852.17	557873	1.07%	25.04%	28.62%
16-08-22	0	0.00	0.00	60000	131.92	791550.00	120.16	7209353.63	2495920	120.16	299899498.54	1352919	0.00%	4.43%	4.43%
17-08-22	80673	144.63	11667992.40	75258	142.71	10739861.60	120.92	9100368.68	2501335	120.92	302467122.26	762354	3.18%	10.58%	20.45%
21-08-22	9652	152.51	1471997.70	69000	150.32	10371897.30	121.04	832014.28	2441987	121.04	295587105.68	1370333	8.44%	0.70%	5.74%
22-08-22	73050	166.25	12144771.50	90500	168.99	15293767.50	122.36	11073290.33	2424537	122.36	296658586.85	1367866	9.99%	5.34%	11.96%
23-08-22	6660	185.83	1237396.00	31000	186.23	573120.00	122.53	3798450.59	2400197	122.53	294097732.27	1076925	9.95%	0.62%	3.50%
24-08-22	167707	196.11	32889463.20	138833	198.73	27589676.70	127.34	17678469.80	2429071	127.34	309308725.67	1683329	4.60%	9.96%	18.21%
25-08-22	8513	212.50	1809017.00	85500	210.02	17956893.60	127.63	10912677.06	2352084	127.63	300205065.61	897663	10.00%	0.95%	10.47%
28-08-22	375975	233.09	87635854.00	98529	203.30	20031125.80	142.17	14007606.86	2629530	142.17	3738333312.75	1952979	5.05%	19.25%	24.30%
29-08-22	81810	218.11	17843628.50	484906	216.23	104850270.00	144.46	70048942.17	2226434	144.46	321627999.07	1373157	5.67%	5.96%	41.27%
30-08-22	265494	257.05	68245550.90	611630	227.59	13920237.00	156.45	95692315.10	1880298	156.45	294181234.88	1274144	8.72%	20.84%	68.84%
31-08-22	439952	287.18	126346452.30	11000	287.72	3164950.00	181.24	1993666.44	2309250	181.24	418534020.74	1270924	8.74%	34.62%	35.48%
01-09-22	348896	303.23	105794124.80	295753	283.55	8385991.40	197.25	58338263.60	2362393	197.25	465989881.94	2090917	16.69%	14.14%	30.83%
04-09-22	377275	312.66	117958124.20	417178	284.29	118752205.60	213.15	89034727.28	2321950	213.15	494912728.86	1943211	19.42%	21.50%	40.91%
05-09-22	58400	324.09	18926942.40	19400	314.17	6094990.00	215.87	4187829.64	2360950	215.87	509652391.61	828902	7.05%	2.34%	9.39%

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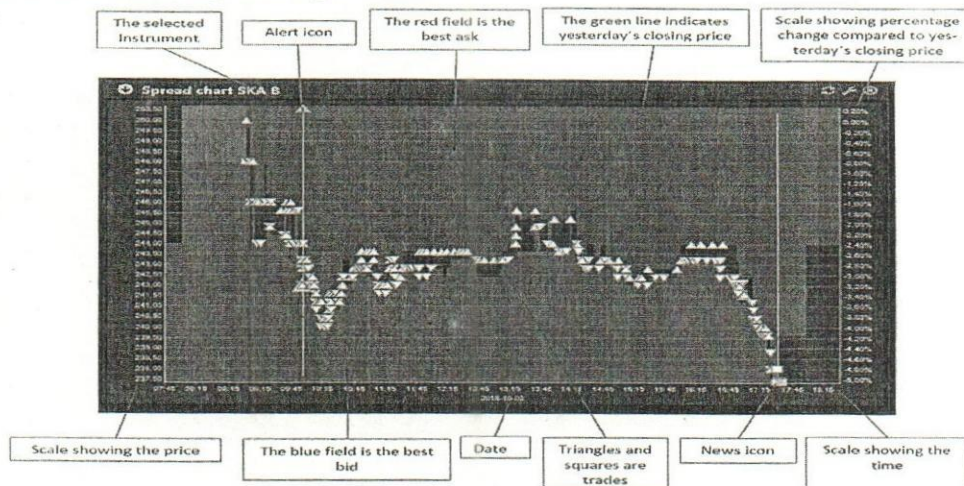
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07-09-22	135958	378.22	103914811.10	150000	329.58	49437125.80	239.75	35962803.82	2356103	239.75	564880466.39	1490653	385.40	8.75%	18.43%	10.06%	28.49%
08-09-22	176052	398.80	70209947.60	515990	356.87	184142970.00	250.81	129415577.92	2016165	250.81	505674836.07	1455825	419.00	8.72%	12.09%	35.44%	47.54%
11-09-22	607224	426.84	259190273.30	298491	385.72	115132972.70	291.56	87026876.82	2324898	291.56	677838232.55	1357765	407.60	-2.72%	44.72%	21.98%	66.71%
12-09-22	218477	399.02	87303814.60	100000	372.50	37250000.00	300.84	30083925.77	2443375	300.84	735063121.37	675535	400.80	-1.07%	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%
18-09-22	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	4329490.45	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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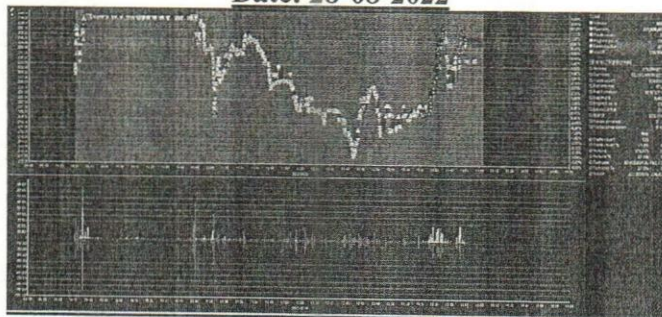
▲ Green triangle represents trade of ORIONINFU by Md. Sohel Alam, Mohammad Ebadul Karim and their associates

△ 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:

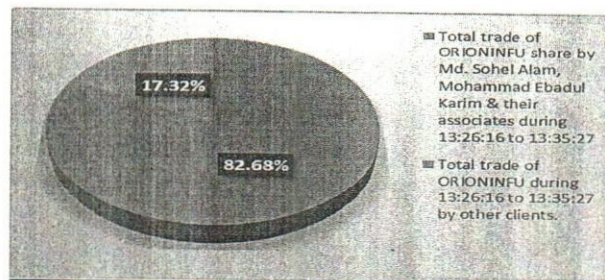
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1601880064821881; 1601880065365037; 1203710048667734; 1203710075253110
(Combined)

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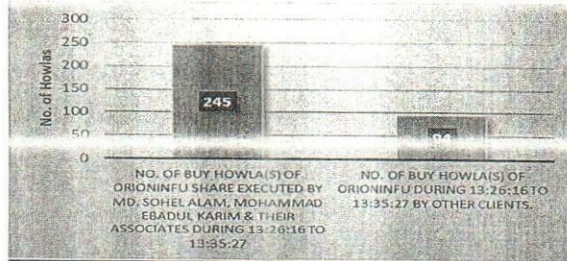
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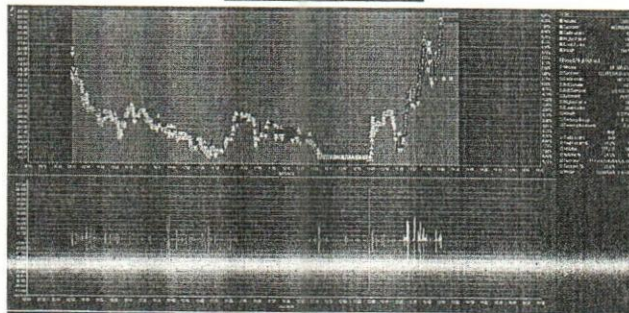
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 245 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 339 as shown in the following Bar Chart.



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.

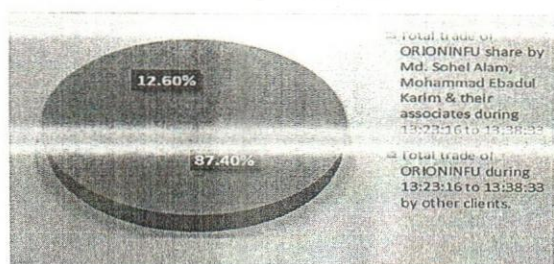
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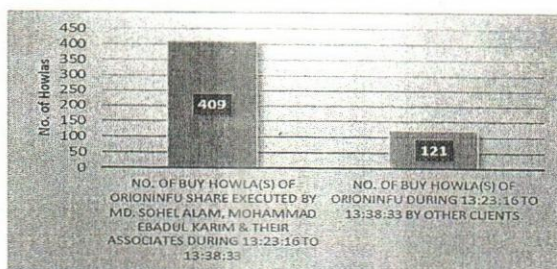
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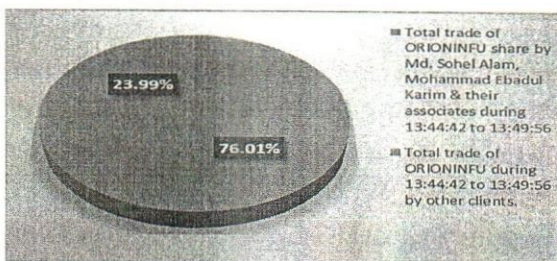


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 409 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 530 as shown in the following Bar Chart.



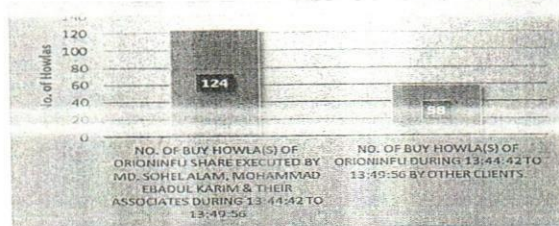
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 87.40% of the total trades of ORIONINFU shares by executing 409 of total 530 howlas from 13:23:16 to 13:38:33 on 04-09-2022. From 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul 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. 334.90 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.



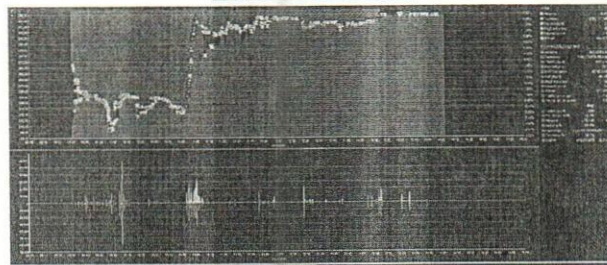
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 124 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 182 as shown in the following Bar Chart.

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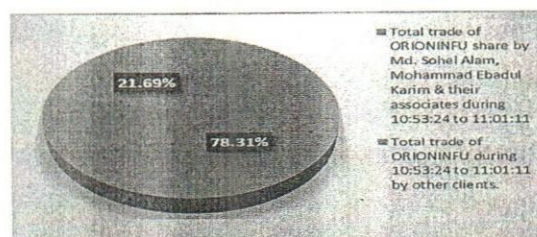
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 76.01% of the total trades of ORIONINFU shares by executing 124 of total 182 howlas from 13:44:42 to 13:49:56 on 04-09-2022. From 13:44:42 to 13:49:56, Md. Sohel Alam, Mohammad Ebadul 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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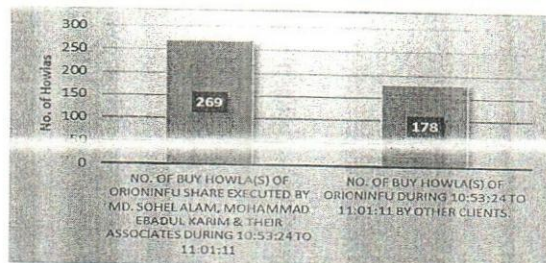
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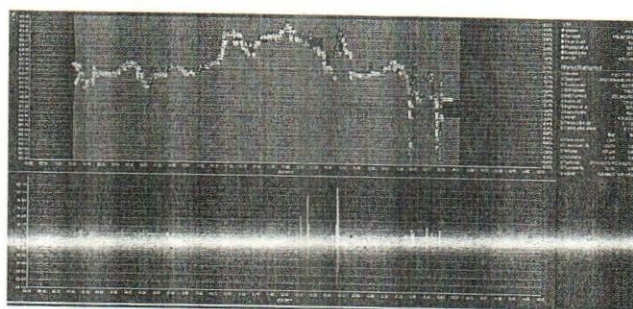
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 269 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 447 as shown in the following Bar Chart.



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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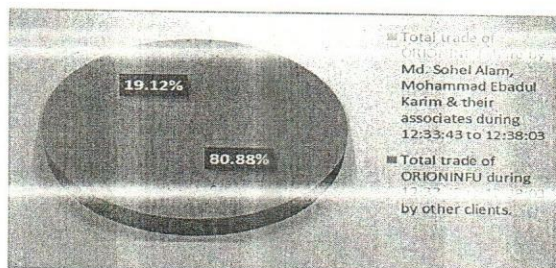
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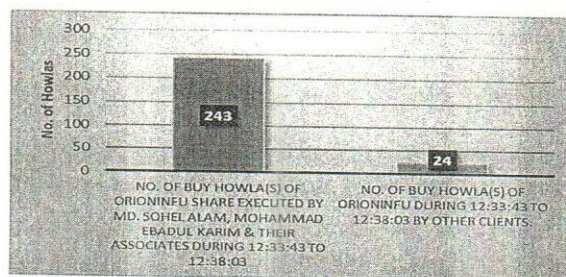
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Mohammad Ebadul Karim and their associates bought 210,078 shares of ORIONINFU compared to the total traded share of 268,138. This is shown in the following Pie Chart.

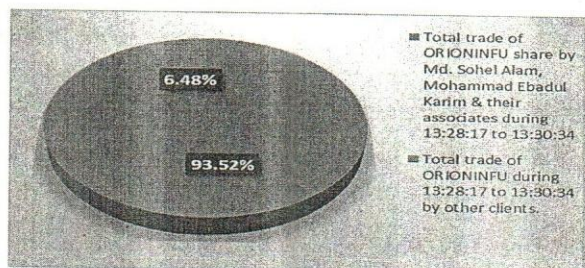


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 243 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 267 as shown in the following Bar Chart.



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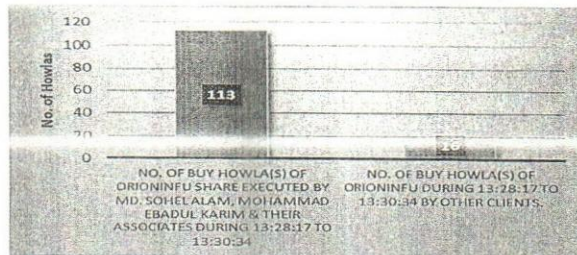
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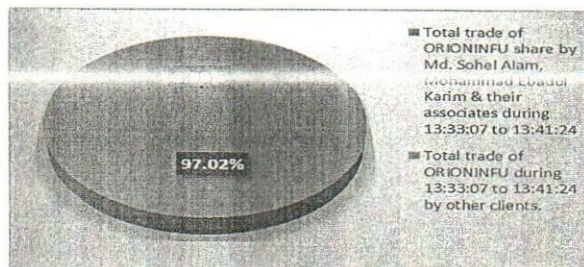
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 113 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 129 as shown in the following Bar Chart.

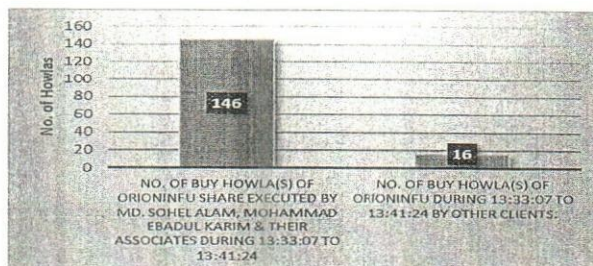


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 93.52% of the total trades of ORIONINFU shares by executing 113 of total 129 howlas from 13:28:17 to 13:30:34 on 11-09-2022. From 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul 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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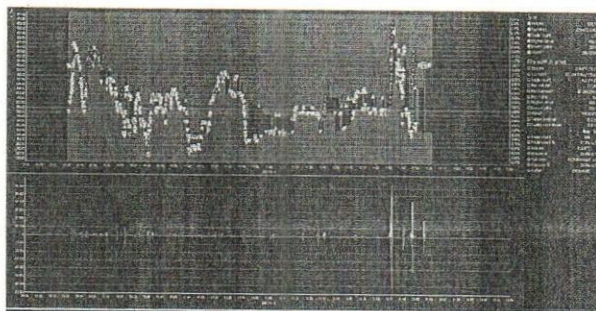
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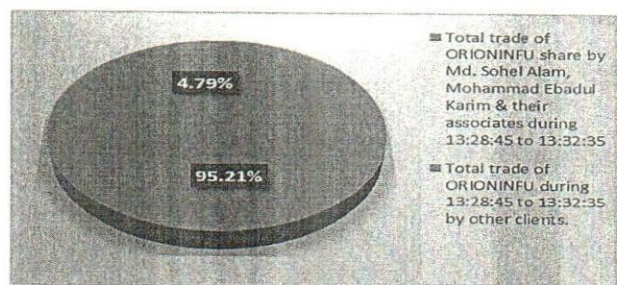
it is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 97.02% of the total trades of ORIONINFU shares by executing 146 of total 162 howlas from 13:33:07 to 13:41:24 on 11-09-2022. From 13:33:07 to 13:41:24, Md. Sohel Alam, Mohammad Ebadul 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.

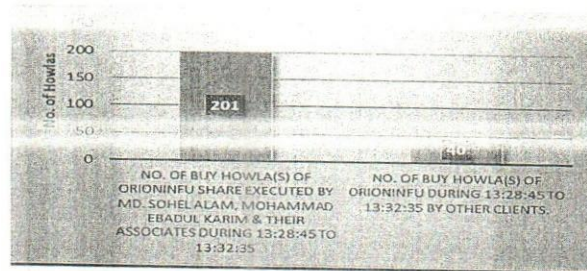
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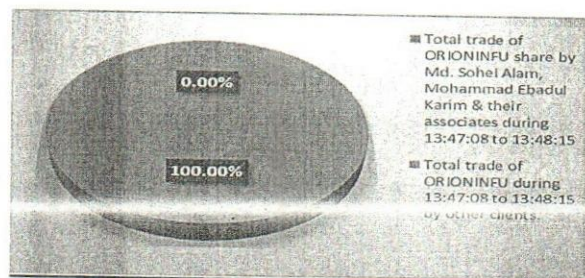
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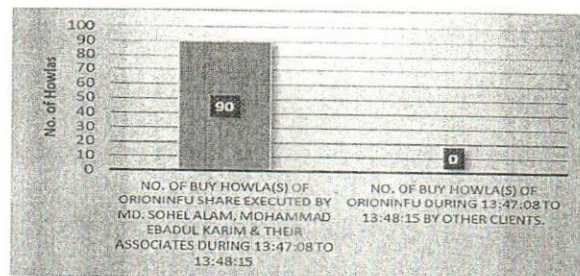


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.21% of the total trades of ORIONINFU shares by executing 201 of total 241 howlas from 13:28:45 to 13:32:35 on 12-09-2022. From 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul 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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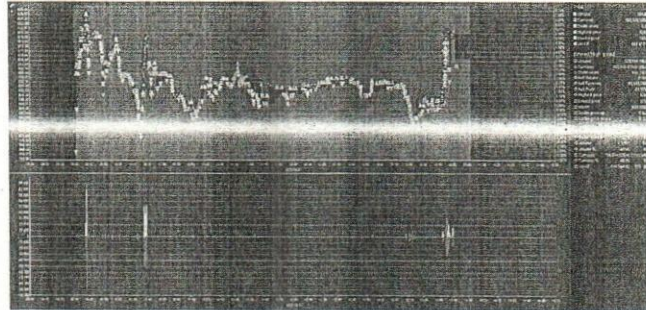
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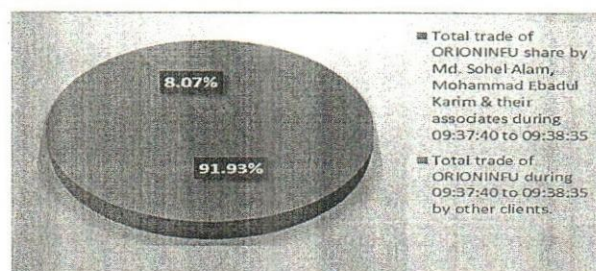
rise from Tk. 390.00 to Tk. 404.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

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.

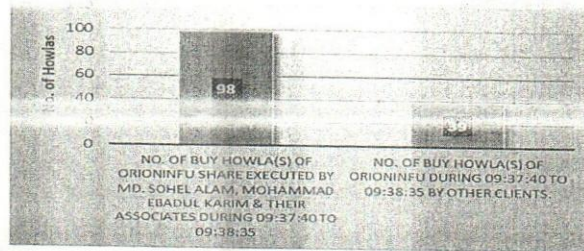
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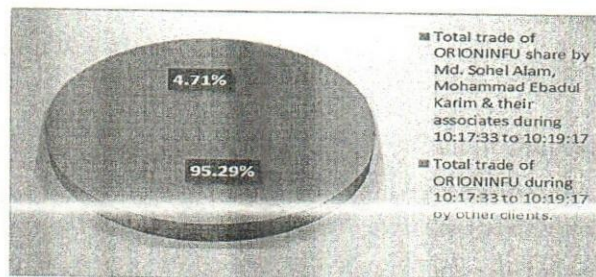
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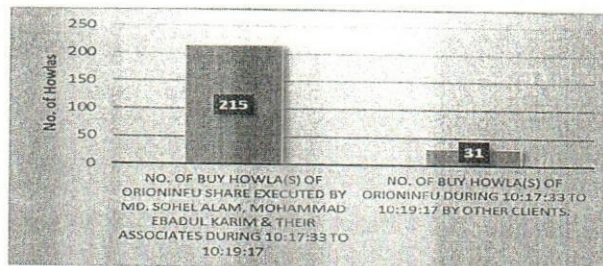


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 91.93% of the total trades of ORIONINFU shares by executing 98 of total 137 howlas from 9:37:40 to 9:38:35 on 21-09-2022. From 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul 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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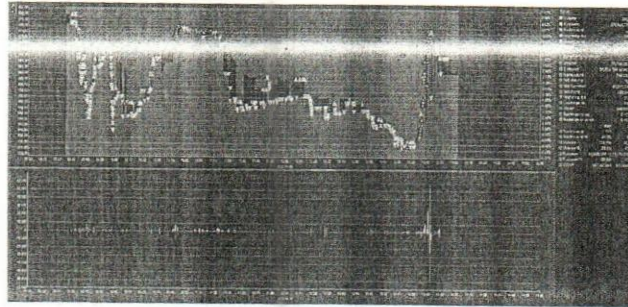
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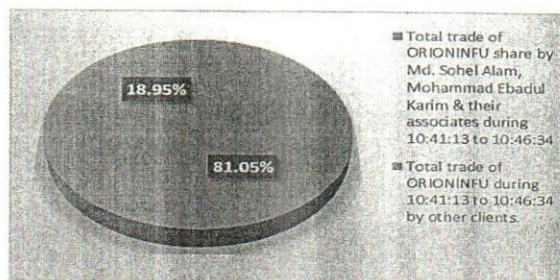
to rise from Tk. 595.00 to Tk. 610.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 20.40 which is approximately 3.50% higher than YCP.

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.

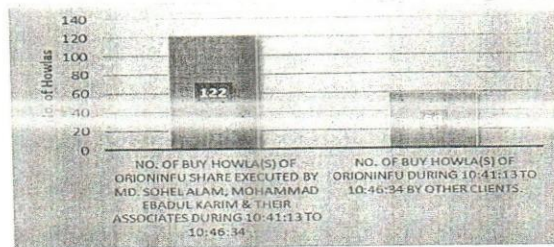
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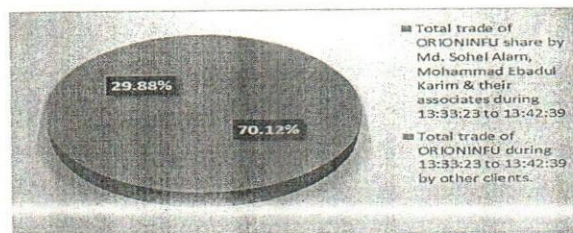
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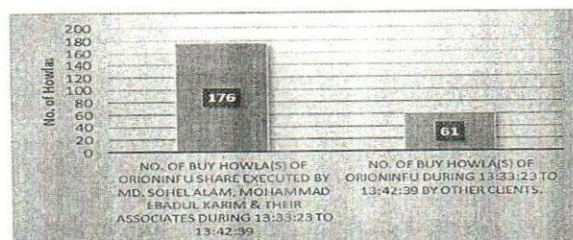


It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 81.05% of the total trades of ORIONINFU shares by executing 122 of total 181 howlas from 10:41:13 to 10:46:34 on 25-09-2022. From 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul 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.

[Signature]

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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		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
11,100	147.00	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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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.

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	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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14/07/2022	10:20:30	254396813	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396814	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396815	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396816	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396817	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396818	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396819	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396820	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396821	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396822	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
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24/07/2022	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
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24/07/2022	10:51:00	255220909	ORIONINFU	153	112.4	DSEABF	5058	1203710064190682	DSEABF	3371	1203710046187231	Public
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25/07/2022	10:44:34	255321057	ORIONINFU	900	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:45	255321139	ORIONINFU	100	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322870	ORIONINFU	981	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322873	ORIONINFU	1000	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322874	ORIONINFU	904	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255322945	ORIONINFU	96	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255322946	ORIONINFU	904	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:26	255323043	ORIONINFU	896	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:26	255323044	ORIONINFU	1000	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:43	255323159	ORIONINFU	904	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:23:44	255334170	ORIONINFU	347	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:25:24	255334841	ORIONINFU	377	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:40:39	255341730	ORIONINFU	1000	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	14:29:30	255440853	ORIONINFU	495	108.4	DSEABF	3214	1203710043493921	DSEABF	3371	1203710046187231	Public
26/07/2022	13:13:07	255581303	ORIONINFU	1000	108.4	DSEABF	3371	1203710046187231	DSEABF	5058	1203710064190682	Public
26/07/2022	14:29:30	255635030	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
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26/07/2022	14:29:30	255635038	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635040	ORIONINFU	703	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635041	ORIONINFU	2797	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635043	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635045	ORIONINFU	2703	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635046	ORIONINFU	797	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
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26/07/2022	14:29:49	255635787	ORIONINFU	523	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635789	ORIONINFU	3962	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635790	ORIONINFU	10000	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635791	ORIONINFU	6038	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public

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07/08/2022	14:13:16	256958212	ORIONINFU	2110	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:13:21	256958287	ORIONINFU	2200	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:13:24	256958343	ORIONINFU	2200	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:13:29	256958425	ORIONINFU	951	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:13:31	256958457	ORIONINFU	1249	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:13:40	256958601	ORIONINFU	13590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958602	ORIONINFU	6410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958603	ORIONINFU	11590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958604	ORIONINFU	8410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958605	ORIONINFU	9590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958606	ORIONINFU	10410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958607	ORIONINFU	7590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958608	ORIONINFU	12410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958609	ORIONINFU	5590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958610	ORIONINFU	14410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958611	ORIONINFU	3590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958612	ORIONINFU	16410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958613	ORIONINFU	1590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958614	ORIONINFU	18000	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958615	ORIONINFU	410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958616	ORIONINFU	17590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958617	ORIONINFU	2410	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:13:40	256958618	ORIONINFU	15590	131.9	DSEABF	5058	1203710064190682	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:19:54	256966064	ORIONINFU	1020	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:19:54	256966065	ORIONINFU	1120	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:19:54	256966066	ORIONINFU	60	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:19:54	256966067	ORIONINFU	1060	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:19:54	256966068	ORIONINFU	1120	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:19:54	256966069	ORIONINFU	20	131.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
07/08/2022	14:20:00	256966201	ORIONINFU	1900	131.9	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
07/08/2022	14:22:11	256969306	ORIONINFU	2510	131.9	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
08/08/2022	10:04:21	256989005	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989006	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989007	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989008	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989009	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989010	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989011	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989012	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989013	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989014	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:16:14	257000652	ORIONINFU	675	131.8	DSEMTB	22985	1601880065365037	DSEABF	3371	1203710046187231	Public
08/08/2022	12:30:09	257088087	ORIONINFU	1000	131.9	DSEABF	3214	1203710043493921	DSEABF	5058	1203710064190682	Public
08/08/2022	12:30:25	257088188	ORIONINFU	383	131.8	DSEABF	3214	1203710043493921	DSEABF	5058	1203710064190682	Public
10/08/2022	11:50:02	257247206	ORIONINFU	581	134.4	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
10/08/2022	14:28:18	257332658	ORIONINFU	4140	132.6	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
14/08/2022	14:27:44	257575424	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:28:34	257576680	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:28:34	257576681	ORIONINFU	275	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578292	ORIONINFU	1725	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578294	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578295	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578296	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578297	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578298	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public

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14/08/2022	14:29:26	257578300	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
14/08/2022	14:29:26	257578301	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
14/08/2022	14:29:26	257578302	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
14/08/2022	14:29:26	257578304	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
22/08/2022	12:32:54	258319843	ORIONINFU	654	173.8	DSEMTB	23176	1601880043377493	DSEABF	3214	12037100433493921	Public
24/08/2022	13:34:08	258866412	ORIONINFU	900	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:08	258866413	ORIONINFU	22	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:08	258866414	ORIONINFU	582	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:13	258866511	ORIONINFU	541	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:13	258866512	ORIONINFU	476	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:13	258866513	ORIONINFU	532	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:35	258866595	ORIONINFU	1011	203	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:56	258867300	ORIONINFU	145	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:56	258867391	ORIONINFU	12	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:56	258867392	ORIONINFU	355	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:34:56	258867393	ORIONINFU	32	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:35:16	258867787	ORIONINFU	32	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:45:07	258881057	ORIONINFU	2000	199.7	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:45:21	258881478	ORIONINFU	1000	199.6	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:45:59	258882443	ORIONINFU	1000	199	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:46:19	258883024	ORIONINFU	2000	198.9	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
24/08/2022	13:46:19	258883206	ORIONINFU	1000	198.9	DSEMTB	23176	1601880043377493	DSEUBR	11755	12055900433493921	Public
29/08/2022	13:30:35	2597338873	ORIONINFU	5	237.7	DSEUBR	11755	12055900433493921	DSEABF	5058	12037100433493921	Public
29/08/2022	13:34:32	259749610	ORIONINFU	14500	211	DSEMTB	22936	1601880043377493	DSEABF	3214	12037100433493921	Block
29/08/2022	13:34:32	259749610	ORIONINFU	50000	211	DSEMTB	22936	1601880043377493	DSEABF	3214	12037100433493921	Block
30/08/2022	10:30:17	259850151	ORIONINFU	123	257.3	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:30:50	259850744	ORIONINFU	1000	257.7	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:30:54	259850817	ORIONINFU	67	257.8	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:30:54	259850818	ORIONINFU	1033	257.8	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:31:22	259851280	ORIONINFU	900	258.1	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:29	259852363	ORIONINFU	66	258.7	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:29	259852364	ORIONINFU	1934	258.7	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:33	259852423	ORIONINFU	66	258.8	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:33	259852424	ORIONINFU	934	258.8	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:46	259852643	ORIONINFU	1000	259.2	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:55	259852807	ORIONINFU	66	259.3	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:32:55	259852808	ORIONINFU	1745	259.3	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:33:03	259852992	ORIONINFU	255	259.6	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	10:33:03	259852993	ORIONINFU	745	259.6	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
30/08/2022	12:35:40	259965360	ORIONINFU	44500	223	DSEABF	5674	1203710075253110	DSEMTB	22936	16018800433493921	Block
31/08/2022	10:38:54	260159372	ORIONINFU	2000	288.7	DSEMTB	22985	1601880065365037	DSEABF	3214	12037100433493921	Public
01/09/2022	09:38:02	260399501	ORIONINFU	42000	313.8	DSEABF	3371	12037100433493921	DSEUBR	11755	12055900433493921	Public
04/09/2022	13:25:41	260954110	ORIONINFU	200	303	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
04/09/2022	13:26:00	260954505	ORIONINFU	200	307	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
04/09/2022	13:26:07	260954638	ORIONINFU	200	308.7	DSEMTB	23176	1601880043377493	DSEABF	3371	12037100433493921	Public
06/09/2022	13:04:21	261394140	ORIONINFU	61	354.7	DSEUBR	11755	12055900433493921	DSEABF	3371	12037100433493921	Public
07/09/2022	10:54:15	261558079	ORIONINFU	995	358.5	DSECB	CM489	1605170064190682	DSEABF	3214	12037100433493921	Public
07/09/2022	10:54:15	261558080	ORIONINFU	5	358.5	DSECB	CM489	1605170064190682	DSEABF	3214	12037100433493921	Public
07/09/2022	10:54:45	261558573	ORIONINFU	1000	359.9	DSECB	CM489	1605170064190682	DSEABF	3214	12037100433493921	Public
07/09/2022	10:57:38	261561928	ORIONINFU	625	374.9	DSEMTB	23176	1601880043377493	DSEABF	3214	12037100433493921	Public

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07/09/2022	10:57:59	261562640	ORIONINFU	375	378.9	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:21	261562640	ORIONINFU	100	378.9	DSECBF	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:31	261562780	ORIONINFU	430	378.9	DSECBF	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:40	261562961	ORIONINFU	370	378.9	DSECBF	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	12:18:26	261633698	ORIONINFU	221	384.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	12:18:26	261633699	ORIONINFU	1000	384.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	13:13:13	261675217	ORIONINFU	279	384.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	13:35:38	261703566	ORIONINFU	2279	385.4	DSEMTB	10310	1601880046187231	DSEABF	3214	1203710043493921	Public
11/09/2022	12:35:26	262145806	ORIONINFU	500	432.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:35:46	262145887	ORIONINFU	500	432.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:36:12	262146278	ORIONINFU	500	434.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:37:09	262147015	ORIONINFU	500	433.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642118	ORIONINFU	63	400.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642119	ORIONINFU	937	400.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:45:34	262648774	ORIONINFU	9000	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:45:34	262648776	ORIONINFU	9000	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:45:40	262648931	ORIONINFU	2649	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:46:09	262649775	ORIONINFU	8375	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:46:09	262649777	ORIONINFU	625	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
15/09/2022	09:33:15	262885099	ORIONINFU	1000	467.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
15/09/2022	09:33:20	262885153	ORIONINFU	2000	467.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
15/09/2022	09:33:39	262885490	ORIONINFU	900	467.4	DSEUBR	11788	1205590075153283	DSEABF	3371	1203710046187231	Public
15/09/2022	12:33:03	263014249	ORIONINFU	3100	467.4	DSEMTB	23176	1601880043377493	DSEUBR	11788	1205590075153283	Block
19/09/2022	09:32:05	263375227	ORIONINFU	527	546	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
19/09/2022	09:32:21	263375554	ORIONINFU	861	546.2	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
19/09/2022	09:32:30	263375800	ORIONINFU	1000	546.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
21/09/2022	10:17:33	264032257	ORIONINFU	1000	595	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
21/09/2022	10:19:12	264034019	ORIONINFU	240	615	DSEMTB	10310	1601880046187231	DSEABF	3371	1203710046187231	Public
22/09/2022	13:51:02	264462870	ORIONINFU	2650	575.6	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
22/09/2022	13:51:02	264462872	ORIONINFU	5000	575.6	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
25/09/2022	11:06:00	264580789	ORIONINFU	165	574.5	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
25/09/2022	11:07:35	264582014	ORIONINFU	465	574.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
25/09/2022	11:07:40	264582094	ORIONINFU	135	574.5	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
25/09/2022	13:41:10	264709537	ORIONINFU	1000	568.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
27/09/2022	13:41:01	265138996	ORIONINFU	2500	573.6	DSEMTB	10310	1601880046187231	DSEABF	3214	1203710043493921	Public
28/09/2022	13:38:26	265346913	ORIONINFU	1852	570	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
28/09/2022	13:38:26	265346914	ORIONINFU	1148	570	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
10/10/2022	09:43:34	266393189	ORIONINFU	12	797	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
10/10/2022	09:43:35	266393211	ORIONINFU	97	797	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	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-

(ii) 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 cent	Total Qty	Per cent	Total Qty	Per cent	Total Qty	Per cent
1	MD. SOHEL ALAM	23176	MTB Securities Limited	859852.00	4.22%	959852.00	4.71%	1017339.00	5.00%	937339.00	4.60%
2	MOHAMMAD EBADUL KARIM	3371	AB Securities Limited	658263.00	3.23%	543263.00	2.67%	646263.00	3.17%	648946.00	3.19%
3	MOHAMMAD EBADUL KARIM	10310	MTB Securities Limited	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%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	40000.00	0.20%	40000.00	0.20%	40000.00	0.20%	40000.00	0.20%
6	RISANA KARIM	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-EPF	22936	MTB Securities Limited	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%
10	BEACON PHARMACEUTICALS LTD-EPF	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 KARIM	5674	AB Securities Limited	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%
Total No. of Outstanding Securities				20359760	10.95%	2087577.00	10.25%	2298336.00	11.29%	2431351.00	11.94%

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Sl. No	Client Name	Client Code	Name of TREC Holder	22-08-22	23-08-22	24-08-22	25-08-22	26-08-22	27-08-22	28-08-22	29-08-22	30-08-22	31-08-22	01-09-22	02-09-22
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD. SOHEL ALAM	23176	MTB Securities Limited	1039090.00	5.10%	1039090.00	5.10%	1099000.00	5.40%	1099000.00	5.40%	1244150.00	5.11%	947207.00	4.65%
2	MOHAMMAD EBAJUL KARIM	3371	AB Securities Limited	596681.00	2.93%	565681.00	2.78%	471645.00	2.32%	480158.00	2.36%	612627.00	3.01%	541621.00	2.66%
3	MOHAMMAD EBAJUL 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%
4	RISANA KARIM	3214	AB Securities Limited	113861.00	0.56%	115861.00	0.57%	177861.00	0.87%	92861.00	0.46%	168488.00	0.83%	118488.00	0.58%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	39000.00	0.19%			40000.00	0.20%	40500.00	0.20%	60000.00	0.29%	42753.00	0.21%
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%
7	BEACON MEDICARE LTD.	5058	AB Securities Limited	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	424368.00	2.08%	391968.00	1.93%
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%
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%	78200.00	0.38%	128200.00	0.63%
10	BEACON PHARMACEUTICALS LTD-EGF	22985	MTB Securities Limited	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	32137.00	0.16%	46637.00	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%
12	NURUNNAHAR KARIM	5674	AB Securities Limited	0.00	0.00%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%
Total				2418637.00	11.88%	2355297.00	11.57%	2423171.00	11.90%	2347184.00	11.53%	2624630.00	12.89%	2221534.00	10.91%
Total No. of Outstanding Securities				20359760	11.88%		11.57%		11.90%		11.53%		12.89%		10.91%

Sl. No	Client Name	Client Code	Name of TREC Holder	04-09-22	05-09-22	06-09-22	07-09-22	11-09-22	12-09-22	13-09-22	21-09-22
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD. SOHEL ALAM	23176	MTB Securities Limited	1233398.00	6.06%	1273498.00	6.25%	1073498.00	5.27%	1213498.00	5.96%
2	MOHAMMAD EBAJUL KARIM	3371	AB Securities Limited	195968.00	0.96%	189968.00	0.93%	183968.00	0.90%	185968.00	0.91%
3	MOHAMMAD EBAJUL KARIM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	98703.00	0.48%	118703.00	0.58%
4	RISANA KARIM	3214	AB Securities Limited	152773.00	0.75%	157573.00	0.77%	137758.00	0.68%	102758.00	0.50%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	44153.00	0.22%	43753.00	0.21%	41268.00	0.20%	41268.00	0.20%
6	RISANA KARIM	11788	UCB Stock Brokerage Limited	83652.00	0.41%	84152.00	0.41%	84152.00	0.41%	84152.00	0.41%
7	BEACON MEDICARE LTD.	5058	AB Securities Limited	296968.00	1.46%	296968.00	1.46%	296968.00	1.46%	296968.00	1.46%
8	BEACON MEDICARE LTD.	CM489	City Bank Capital Resources Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	112750.00	0.55%
9	BEACON PHARMACEUTICALS LTD-EPF	22936	MTB Securities Limited	115700.00	0.57%	115700.00	0.57%	115700.00	0.57%	700.00	0.00%
10	BEACON PHARMACEUTICALS LTD-EGF	22985	MTB Securities Limited	42137.00	0.21%	42137.00	0.21%	42137.00	0.21%	2137.00	0.01%
11	Beacon Pharmaceuticals Ltd.	7053	AB Securities Limited	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%
12	NURUNNAHAR KARIM	5674	AB Securities Limited	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%
Total				2317050.00	11.38%	2356050.00	11.57%	2226453.00	10.94%	2238453.00	10.99%
Total No. of Outstanding Securities				20359760	11.38%		11.57%		10.94%		10.99%

Sl. No	Client Name	Client Code	Name of TREC Holder	22-09-22		25-09-22		26-09-22		27-09-22		28-09-22		29-09-22		02-10-22		03-10-22		04-10-22		12-10-22	
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	M.D. SOHEL ALAM	23176	MTB Securities Limited	981749.00	4.82%	1039222.00	5.10%	1039222.00	5.10%	992222.00	4.87%	1066270.00	5.09%	1017270.00	5.00%	1017270.00	5.00%	1017270.00	5.00%	967270.00	4.75%	977704.00	4.80%
2	M.OHAMMAD EBAJUL KARIM	3371	AB Securities Limited	176415.00	0.87%	136465.00	0.67%	156565.00	0.77%	191221.00	0.94%	188221.00	0.92%	165998.00	0.82%	173998.00	0.85%	167418.00	0.82%	175759.00	0.86%	164392.00	0.81%
3	M.OHAMMAD EBAJUL KARIM	10310	MTB Securities Limited	133843.00	0.66%	133843.00	0.66%	133843.00	0.66%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	28844.00	0.14%
4	RISANA KARIM	3214	AB Securities Limited	46781.00	0.23%	93514.00	0.46%	112044.00	0.55%	76426.00	0.38%	91572.00	0.49%	100580.00	0.49%	37980.00	0.19%	102163.00	0.50%	93822.00	0.46%	94013.00	0.46%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%		0.00%	30474.00	0.15%	30473.00	0.15%	30479.00	0.15%	30479.00	0.15%
6	RISANA KARIM	11788	UCB Stock Brokerage Limited	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%		0.00%	58949.00	0.29%	58954.00	0.29%	58954.00	0.29%	57591.00	0.28%
7	BEACON MEDICARE LTD.	5058	AB Securities Limited	268471.00	1.32%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%
8	BEACON MEDICARE LTD.	CM489	City Bank Capital Resources Limited	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%
9	BEACON PHARMACEUTICALS LTD-EPF	22936	MTB Securities Limited	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%
10	BEACON PHARMACEUTICALS LTD-EGF	22985	MTB Securities Limited	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%
11	Beacon Pharmaceuticals Ltd.	7053	AB Securities Limited	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%
12	NURUNNAHAR KARIM	5674	AB Securities Limited	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%
Total				2101577.00	10.32%	2175833.00	10.69%	2214463.00	10.88%	2189001.00	10.65%	2233195.00	10.97%	2109557.00	10.33%	2130380.00	10.50%	2199993.00	10.79%	2145993.00	10.54%	2036389.00	10.00%
Total No. of Outstanding Securities				20359760	10.32%		10.69%		10.88%		10.65%		10.97%		10.33%		10.50%		10.79%		10.54%		10.00%

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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 প্রণয়ন 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 যাযারা 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 - 3:

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 MR. MOHAMMAD EBADUL KARIM

i. Individual Trade Patterns of Mr. Mohammad Ebadul Karim (Only Public Market):

Date	Code # 3371				Code # 10310				Total					
	BO ID # 1203710046187231				BO ID # 1601880046187231									
	MOHAMMAD EBADUL KARIM				MOHAMMAD EBADUL KARIM									
	AP Securities Limited				MTB Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
21-06-2022	10000	80.93	0	0.00	0	0.00	0	0.00	10000	80.93	809307.80	0	0.00	0.00
22-06-2022	3100	82.28	0	0.00	0	0.00	0	0.00	3100	82.28	255059.30	0	0.00	0.00
23-06-2022	12133	85.04	8000	84.61	0	0.00	0	0.00	12133	85.04	1031771.40	8000	84.61	676900.00
26-06-2022	49872	84.45	0	0.00	0	0.00	0	0.00	49872	84.45	4211937.10	0	0.00	0.00
27-06-2022	82771	84.09	0	0.00	0	0.00	0	0.00	82771	84.09	6960530.60	0	0.00	0.00
28-06-2022	72839	85.05	0	0.00	0	0.00	0	0.00	72839	85.05	6194966.90	0	0.00	0.00
29-06-2022	74156	86.56	25868	87.12	0	0.00	0	0.00	74156	86.56	6418887.40	25868	87.12	2253559.00
30-06-2022	186728	87.42	100	87.70	0	0.00	0	0.00	186728	87.42	16324191.60	100	87.70	8770.00
03-07-2022	71735	87.52	23664	86.44	0	0.00	0	0.00	71735	87.52	6278057.20	23664	86.44	2045569.60
04-07-2022	1145	87.20	129264	89.07	0	0.00	0	0.00	1145	87.20	99844.00	129264	89.07	11513933.00
05-07-2022	179157	93.42	27938	92.57	0	0.00	0	0.00	179157	93.42	16736323.30	27938	92.57	2586117.60
06-07-2022	16421	93.30	16437	94.91	0	0.00	0	0.00	16421	93.30	1532132.30	16437	94.91	1560100.50
07-07-2022	195517	97.19	76000	96.49	0	0.00	0	0.00	195517	97.19	19001451.50	76000	96.49	7333493.40
14-07-2022	19965	94.76	60800	95.97	0	0.00	0	0.00	19965	94.76	1891973.00	60800	95.97	5835260.00
17-07-2022	27620	96.85	5000	98.70	0	0.00	0	0.00	27620	96.85	2674989.00	5000	98.70	493500.00
18-07-2022	80162	99.40	106530	100.06	0	0.00	0	0.00	80162	99.40	7968466.90	106530	100.06	10659068.80
19-07-2022	46000	98.23	2951	99.30	0	0.00	0	0.00	46000	98.23	4518650.00	2951	99.30	293034.30
20-07-2022	3000	99.50	30000	102.12	0	0.00	0	0.00	3000	99.50	298500.00	30000	102.12	3063578.20
21-07-2022	118230	107.10	71000	106.36	0	0.00	0	0.00	118230	107.10	12662908.80	71000	106.36	7551879.30
24-07-2022	36331	108.94	41331	110.40	0	0.00	0	0.00	36331	108.94	3957992.90	41331	110.40	4562852.50
25-07-2022	22791	107.60	52822	107.75	0	0.00	0	0.00	22791	107.60	2452318.00	52822	107.75	5691491.80
26-07-2022	53175	108.25	0	0.00	0	0.00	0	0.00	53175	108.25	5756083.80	0	0.00	0.00
27-07-2022	0	0.00	25000	109.01	0	0.00	0	0.00	0	0.00	0.00	25000	109.01	2725317.00
28-07-2022	15550	104.77	0	0.00	0	0.00	0	0.00	15550	104.77	1620159.00	0	0.00	0.00
31-07-2022	16820	108.03	55825	112.11	0	0.00	0	0.00	16820	108.03	1817140.00	55825	112.11	6258682.50
01-08-2022	44257	116.18	30500	118.17	0	0.00	0	0.00	44257	116.18	5141939.60	30500	118.17	3604137.50
02-08-2022	52000	116.02	151000	117.90	0	0.00	0	0.00	52000	116.02	6033274.20	151000	117.90	17802800.00
03-08-2022	12505	123.08	179505	125.29	0	0.00	0	0.00	12505	123.08	1539154.20	179505	125.29	22491026.50
04-08-2022	0	0.00	31204	130.79	0	0.00	0	0.00	0	0.00	0.00	31204	130.79	4081272.80
07-08-2022	320022	130.42	0	0.00	0	0.00	0	0.00	320022	130.42	41736901.80	0	0.00	0.00
08-08-2022	0	0.00	115000	132.50	0	0.00	0	0.00	0	0.00	0.00	115000	132.50	15237907.30
10-08-2022	103000	134.65	0	0.00	0	0.00	0	0.00	103000	134.65	13869380.00	0	0.00	0.00
11-08-2022	26920	130.65	24237	133.01	0	0.00	0	0.00	26920	130.65	3517178.50	24237	133.01	3223832.90
14-08-2022	12100	130.24	0	0.00	0	0.00	0	0.00	12100	130.24	1575852.00	0	0.00	0.00
16-08-2022	0	0.00	60000	131.92	0	0.00	0	0.00	0	0.00	0.00	60000	131.92	7915150.00
17-08-2022	40585	143.57	0	0.00	0	0.00	0	0.00	40585	143.57	5826980.40	0	0.00	0.00
21-08-2022	0	0.00	69000	150.32	0	0.00	0	0.00	0	0.00	0.00	69000	150.32	10371897.30
22-08-2022	24050	163.29	0	0.00	0	0.00	0	0.00	24050	163.29	3927056.50	0	0.00	0.00
23-08-2022	0	0.00	31000	186.23	0	0.00	0	0.00	0	0.00	0.00	31000	186.23	5773120.00
24-08-2022	9797	194.80	103833	198.65	0	0.00	0	0.00	9797	194.80	1908498.00	103833	198.65	20626370.10
25-08-2022	8513	212.50	0	0.00	0	0.00	0	0.00	8513	212.50	1809017.00	0	0.00	0.00
28-08-2022	135603	234.07	3134	236.44	0	0.00	0	0.00	135603	234.07	31740572.10	3134	236.44	741007.80
29-08-2022	0	0.00	71006	237.22	0	0.00	0	0.00	0	0.00	0.00	71006	237.22	16844070.00
30-08-2022	0	0.00	36130	256.96	0	0.00	0	0.00	0	0.00	0.00	36130	256.96	9283847.00
31-08-2022	280452	287.16	0	0.00	0	0.00	0	0.00	280452	287.16	80534754.60	0	0.00	0.00
01-09-2022	187743	306.69	0	0.00	0	0.00	0	0.00	187743	306.69	57578802.20	0	0.00	0.00
04-09-2022	0	0.00	14410	314.74	0	0.00	0	0.00	0	0.00	0.00	14410	314.74	4535380.00
05-09-2022	0	0.00	6000	326.25	0	0.00	0	0.00	0	0.00	0.00	6000	326.25	1957500.00
06-09-2022	0	0.00	6000	354.50	98703	354.90	0	0.00	98703	354.90	35029694.70	6000	354.50	2127000.00

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07-09-2022	2000	346.20	0	0.00	20000	385.40	0	0.00	22000	381.84	8400400.00	0	0.00	0.00
08-09-2022	0	0.00	0	0.00	78052	416.10	0	0.00	78052	416.10	32477398.30	0	0.00	0.00
11-09-2022	17230	410.46	7991	429.02	0	0.00	0	0.00	17230	410.46	7072196.20	7991	429.02	3428272.70
12-09-2022	0	0.00	0	0.00	81749	399.96	0	0.00	81749	399.96	32606197.20	0	0.00	0.00
13-09-2022	3000	389.34	5000	403.39	0	0.00	0	0.00	3000	389.34	1168006.00	5000	403.39	2016971.60
14-09-2022	0	0.00	5000	424.04	0	0.00	0	0.00	0	0.00	0.00	5000	424.04	2120200.00
15-09-2022	0	0.00	5000	464.53	0	0.00	0	0.00	0	0.00	0.00	5000	464.53	2322660.00
18-09-2022	0	0.00	5000	508.20	0	0.00	0	0.00	0	0.00	0.00	5000	508.20	2541000.00
20-09-2022	0	0.00	11157	591.23	0	0.00	0	0.00	0	0.00	0.00	11157	591.23	6603559.00
21-09-2022	0	0.00	5000	598.17	133639	619.20	0	0.00	133639	619.20	82749836.90	5000	598.17	2990845.90
22-09-2022	19429	579.70	0	0.00	0	0.00	0	0.00	19429	579.70	11263010.90	0	0.00	0.00
25-09-2022	0	0.00	39950	572.90	0	0.00	0	0.00	0	0.00	0.00	39950	572.90	22887512.00
26-09-2022	20100	570.08	0	0.00	0	0.00	0	0.00	20100	570.08	11458708.30	0	0.00	0.00
27-09-2022	34656	567.94	0	0.00	2500	573.60	0	0.00	37156	568.32	21116512.80	0	0.00	0.00
28-09-2022	0	0.00	3000	570.00	0	0.00	0	0.00	0	0.00	0.00	3000	570.00	1710000.00
29-09-2022	0	0.00	22223	576.84	0	0.00	0	0.00	0	0.00	0.00	22223	576.84	12819047.20
02-10-2022	8000	618.49	0	0.00	0	0.00	0	0.00	8000	618.49	4947908.00	0	0.00	0.00
03-10-2022	0	0.00	6580	640.76	0	0.00	0	0.00	0	0.00	0.00	6580	640.76	4216189.00
04-10-2022	9341	699.69	1000	697.80	0	0.00	0	0.00	9341	699.69	6535833.70	1000	697.80	697800.00
06-10-2022	0	0.00	10000	753.56	0	0.00	0	0.00	0	0.00	0.00	10000	753.56	7535615.20
10-10-2022	18633	788.00	0	0.00	0	0.00	0	0.00	18633	788.00	14682773.90	0	0.00	0.00
11-10-2022	0	0.00	10000	840.63	6712	859.60	0	0.00	6712	859.60	5769635.20	10000	840.63	8406309.40
12-10-2022	0	0.00	10000	920.90	2263	922.61	0	0.00	2263	922.61	2087875.80	10000	920.90	9209029.90
Total	2785154		1837690		423618		0		3208772			1837690		

ii. Effects of 'ORIONINFU' at DSE by Mohammad Ebadul Karim (Public and Block Market):

Date	Buy			Sale			Bonus Share Credit ed	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						
21-06-2022	10000	80.93	809307.80	0	0.00	0.00	0	0.00	0.00	10000	80.93	809307.80	334986	82.10	2.11%	2.99%	0.00%	2.99%
22-06-2022	3100	82.28	255059.30	0	0.00	0.00	0	0.00	0.00	13100	81.25	1064367.10	177510	83.10	1.22%	1.75%	0.00%	1.75%
23-06-2022	12133	85.04	1031771.40	8000	84.61	676900.00	0	83.07	664570.52	17233	83.07	1431567.98	724333	85.30	2.65%	1.68%	1.10%	2.78%
26-06-2022	49872	84.45	4211937.10	0	0.00	0.00	0	0.00	0.00	67105	84.10	5643505.08	230949	84.40	-1.06%	21.59%	0.00%	21.59%
27-06-2022	82771	84.09	6960530.60	0	0.00	0.00	0	0.00	0.00	149876	84.10	12604035.68	135884	84.20	-0.24%	60.91%	0.00%	60.91%
28-06-2022	72839	85.05	6194966.90	0	0.00	0.00	0	0.00	0.00	222715	84.41	18799002.58	279044	85.10	1.07%	26.10%	0.00%	26.10%
29-06-2022	74156	86.56	6418887.40	25868	87.12	2253559.00	0	84.95	2197373.20	271003	84.95	23020516.78	770145	87.20	2.47%	9.63%	3.36%	12.99%
30-06-2022	186728	87.42	16324191.60	100	87.70	8770.00	0	85.96	8595.60	457631	85.96	39336112.79	465637	87.30	0.11%	40.10%	0.02%	40.12%
03-07-2022	71735	87.52	6278057.20	23664	86.44	2045569.60	0	86.17	2039068.85	505702	86.17	43575101.14	329656	87.60	0.34%	21.76%	7.18%	28.94%
04-07-2022	1145	87.20	99844.00	149264	89.00	13283933.00	0	86.17	12862060.96	357583	86.17	30812884.18	594468	89.80	2.51%	0.19%	25.11%	25.30%
05-07-2022	179157	93.42	16736323.30	27938	92.57	2586117.60	0	88.59	2474996.76	508802	88.59	45074210.72	779820	93.40	4.01%	22.97%	3.58%	26.56%
06-07-2022	16421	93.30	1532132.30	16437	94.91	1560100.50	0	88.74	1458558.48	508786	88.74	45147784.54	1725375	95.00	1.71%	0.95%	0.95%	1.90%
07-07-2022	195517	97.19	19001451.50	76000	96.49	7333493.40	0	91.08	6922222.31	628303	91.08	57227013.74	1282519	96.60	1.68%	15.24%	5.93%	21.17%
14-07-2022	19965	94.76	1891973.00	60800	95.97	5835260.00	0	91.20	5544673.49	587468	91.20	53574313.25	519240	95.70	0.21%	3.85%	11.71%	15.55%
17-07-2022	27620	96.85	2674989.00	5000	98.70	493500.00	0	91.45	457245.97	610088	91.45	55792056.27	767784	98.10	2.51%	3.60%	0.65%	4.25%
18-07-2022	80162	99.40	7968466.90	106530	100.06	10659068.80	0	92.37	9840504.94	583720	92.37	53920018.23	1383331	100.20	2.14%	5.79%	7.70%	13.50%
19-07-2022	46000	98.23	4518650.00	2951	99.30	293034.30	0	92.80	273855.86	626769	92.80	58164812.38	621949	98.40	-1.80%	7.40%	0.47%	7.87%
20-07-2022	3000	99.50	298500.00	30000	102.12	3063578.20	0	92.83	2784988.42	599769	92.83	55678323.96	1634961	105.50	7.22%	0.18%	1.83%	2.02%
21-07-2022	118230	107.10	12662908.80	71000	106.36	7551879.30	0	95.18	6757986.47	646999	95.18	61583246.29	1201045	107.10	1.52%	9.84%	5.91%	15.76%
24-07-2022	36331	108.94	3957992.90	41331	110.40	4562852.50	0	95.91	3964241.23	641999	95.91	61576997.97	2162191	108.30	1.12%	1.68%	1.91%	3.59%
25-07-2022	22791	107.60	2452318.00	52822	107.75	5691491.80	0	96.32	5087556.26	611968	96.32	58941759.70	1057758	107.80	-0.46%	2.15%	4.99%	7.15%
26-07-2022	53175	108.25	5756083.80	0	0.00	0.00	0	0.00	0.00	665143	97.27	64697843.50	1045216	108.90	1.02%	5.09%	0.00%	5.09%
27-07-2022	20000	107.90	2158000.00	25000	109.01	2725317.00	0	97.58	2439485.02	660143	97.58	64416358.48	803203	106.80	-1.93%	2.49%	3.11%	5.60%
28-07-2022	15550	104.77	1629158.00	0	0.00	0.00	0	0.00	0.00	675693	97.74	66045516.48	336194	104.70	-1.97%	4.63%	0.00%	4.63%
31-07-2022	16820	108.03	1817140.00	55825	112.11	6258682.50	0	97.99	5470558.38	636688	97.99	62392098.10	1645491	116.30	11.08%	1.02%	3.39%	4.41%

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01-08-2022	4257	116.18	5141939.60	30500	118.17	3604137.50	0	99.18	3024896.50	650445	100.42	15164040.92	551445	100.42	55378374.47	1317898	117.10	-0.51%	3.95%	11.46%	10.44%	1.44%
02-08-2022	5200	116.02	6033274.20	151000	117.90	17802800.00	0	100.42	15164040.92	551445	100.42	15164040.92	551445	100.42	55378374.47	1317898	117.10	-0.51%	3.95%	11.46%	10.44%	1.44%
03-08-2022	12505	122.08	1539154.20	179505	125.29	22491026.50	0	100.93	18116820.61	384445	100.93	38800708.06	1621332	125.50	7.17%	0.77%	11.07%	11.07%	11.07%	11.07%	11.07%	11.07%
04-08-2022	320022	130.42	41736901.80	0	0.00	0.00	0	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
05-08-2022	0	0.00	0.00	0.00	0.00	0.00	0	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
06-08-2022	103000	134.65	13869380.00	0	0.00	0.00	0	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
11-08-2022	26920	130.65	3517178.50	24237	133.01	3223832.90	0	118.51	2872312.78	663946	118.51	78683854.43	1353321	130.50	-2.39%	1.99%	1.79%	1.79%	1.79%	1.79%	1.79%	1.79%
14-08-2022	12100	130.24	1575852.00	0	0.00	0.00	0	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
16-08-2022	0	0.00	0.00	60000	131.92	7915150.00	0	118.72	7123157.87	616046	118.72	73136548.56	1352919	141.30	9.45%	0.00%	4.43%	4.43%	4.43%	4.43%	4.43%	4.43%
17-08-2022	40585	143.57	5826880.40	0	0.00	0.00	0	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
21-08-2022	0	0.00	0.00	69000	150.32	10371897.30	0	120.26	8297633.68	587631	120.26	70665895.28	1370333	158.10	8.44%	0.00%	5.04%	5.04%	5.04%	5.04%	5.04%	5.04%
22-08-2022	24050	163.29	3927056.50	0	0.00	0.00	0	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
23-08-2022	0	0.00	0.00	31000	186.23	5737120.00	0	121.95	3780371.64	580681	121.95	70812580.14	1076925	191.20	9.95%	0.00%	2.88%	2.88%	2.88%	2.88%	2.88%	2.88%
24-08-2022	9797	194.80	1908498.00	103833	198.65	20626370.10	0	123.16	12787686.77	486645	123.16	59933391.37	1683339	200.00	4.60%	0.58%	6.17%	6.17%	6.17%	6.17%	6.17%	6.17%
25-08-2022	8513	212.50	1809017.00	0	0.00	0.00	0	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
28-08-2022	135603	234.07	31740572.10	3134	236.44	741007.80	0	148.21	4644979.67	627627	148.21	93018500.81	1952979	231.10	5.05%	6.94%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%
29-08-2022	0	0.00	0.00	71006	237.22	16844070.00	0	148.21	10523562.03	556621	148.21	82494938.77	1373157	244.20	5.67%	0.00%	5.17%	5.17%	5.17%	5.17%	5.17%	5.17%
30-08-2022	0	0.00	0.00	536130	228.12	122301847.00	0	148.21	79458036.12	20491	148.21	3036902.65	1274144	265.50	8.72%	0.00%	42.08%	42.08%	42.08%	42.08%	42.08%	42.08%
31-08-2022	280452	287.16	80534754.60	0	0.00	0.00	0	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
01-09-2022	187743	306.69	57578802.20	0	0.00	0.00	0	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
04-09-2022	0	0.00	0.00	277718	284.84	79104205.60	0	288.84	80215155.13	210968	288.84	60935304.33	1943211	313.60	1.06%	0.00%	14.29%	14.29%	14.29%	14.29%	14.29%	14.29%
05-09-2022	0	0.00	0.00	6000	326.25	1957500.00	0	288.84	1733020.30	204968	288.84	59202284.03	828902	326.40	4.08%	0.00%	0.72%	0.72%	0.72%	0.72%	0.72%	0.72%
06-09-2022	98703	354.90	35029694.70	6000	354.50	2127000.00	0	310.31	1861856.66	197671	310.31	92370122.07	1155440	354.40	8.58%	8.54%	9.06%	9.06%	9.06%	9.06%	9.06%	9.06%
07-09-2022	22000	381.84	8400400.00	0	0.00	0.00	0	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
08-09-2022	78052	416.10	32477398.30	0	0.00	0.00	0	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
11-09-2022	17230	410.46	7072196.20	126391	386.87	48897172.70	0	338.16	42740261.80	288562	338.16	97579854.78	1357765	407.60	-2.72%	1.27%	10.58%	10.58%	10.58%	10.58%	10.58%	10.58%
12-09-2022	81749	399.96	32669197.20	0	0.00	0.00	0	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
13-09-2022	3000	389.34	1168006.00	5000	403.39	2016971.60	0	352.10	1760516.81	358311	352.10	12968344.17	805037	395.30	-1.37%	0.37%	0.99%	0.99%	0.99%	0.99%	0.99%	0.99%
14-09-2022	0	0.00	0.00	5000	424.04	2120200.00	0	352.10	1760516.81	358311	352.10	12968344.17	805037	395.30	-1.37%	0.37%	0.99%	0.99%	0.99%	0.99%	0.99%	0.99%
15-09-2022	0	0.00	0.00	6274	450.01	2823342.00	0	352.10	2209096.49	357037	352.10	125713927.87	464646	467.40	8.75%	0.00%	1.35%	1.35%	1.35%	1.35%	1.35%	1.35%
18-09-2022	0	0.00	0.00	155900	431.23	67229400.00	0	352.10	54892914.05	201137	352.10	70821013.82	1437759	508.20	8.73%	0.00%	10.84%	10.84%	10.84%	10.84%	10.84%	10.84%
19-09-2022	0	0.00	0.00	9000	489.54	4405900.00	0	352.10	3168930.25	192137	352.10	67652083.56	414861	546.30	7.50%	0.00%	2.17%	2.17%	2.17%	2.17%	2.17%	2.17%
20-09-2022	0	0.00	0.00	11457	584.23	6693558.00	0	352.10	4034048.21	180680	352.10	63618035.35	511515	583.10	6.74%	0.00%	2.24%	2.24%	2.24%	2.24%	2.24%	2.24%
21-09-2022	133639	619.20	82749836.90	8490	586.59	4980145.90	0	465.67	3953509.76	305829	465.67	142414362.49	782367	603.50	3.50%	17.08%	18.17%	18.17%	18.17%	18.17%	18.17%	18.17%
22-09-2022	19429	579.70	11263010.90	0	0.00	0.00	0	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
25-09-2022	0	0.00	0.00	39950	572.90	22887512.00	0	472.48	18875511.34	283308	472.48	134801862.05	412576	565.70	-1.72%	9.66%	9.66%	9.66%	9.66%	9.66%	9.66%	9.66%
26-09-2022	20100	570.08	11458708.30	0	0.00	0.00	0	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
27-09-2022	37156	568.32	21116512.80	0	0.00	0.00	0	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
28-09-2022	0	0.00	0.00	3000	570.00	1710000.00	0	488.60	1465802.74	335564	488.60	165911280.41	295691	564.60	-1.02%	1.01%	1.01%	1.01%	1.01%	1.01%	1.01%	1.01%
29-09-2022	0	0.00	0.00	22223	576.84	12819047.20	0	488.60	10858178.09	317341	488.60	155053102.32	183670	584.10	3.45%	0.00%	12.10%	12.10%	12.10%	12.10%	12.10%	12.10%
02-10-2022	8000	618.49	4947908.00	0	0.00	0.00	0	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
03-10-2022	0	0.00	0.00	6580	640.76	4216189.00	0	491.79	3236009.75	318761	491.79	156765000.57	308072	652.50	5.50%	2.14%	2.14%	2.14%	2.14%	2.14%	2.14%	2.14%
04-10-2022	9341	699.69	653833.70	1000	697.80	697800.00	0	497.71	497713.62	327102	497.71	162803120.65	425765	701.40	7.49%	2.43%	2.43%	2.43%	2.43%	2.43%	2.43%	2.43%
06-10-2022	0	0.00	0.00	10000	753.56	75356.20	0	497.71	497713.62	327102	497.71	157825984.45	246954	753.70	7.46%	4.05%	4.05%	4.05%	4.05%	4.05%	4.05%	4.05%
10-10-2022	18633	788.00	14682773.90	116474	739.64	86149365.00	0	513.82	59847156.60	219261	513.82	112661601.75	555119	799.70	6.10%	20.98%	24.34%	24.34%	24.34%	24.34%	24.34%	24.34%
11-10-2022	6712	859.60	5769635.20	10000	840.63	84063.40	0	524.09	5240946.35	215973	524.09	113190290.60	191924	859.60	7.49%	3.20%	3.20%	3.20%	3.20%	3.20%	3.20%	3.20%
12-10-2022	2263	922.61	2087875.80	10000	920.90	92090.29	0	528.23	5282270.86	208236	528.23	109995895.54	344616	919.60	6.98%	2.90%	3.56%	3.56%	3.56%	3.56%	3.56%	3.56%
Total	3128772	206.84	667835989.80	3020536	233.03	703883810.20	0	184.68	557840094.26	208236	528.23	109995895.54	344616	919.60	6.98%	2.90%	3.56%	3.56%	3.56%	3.56%	3.56%	3.56%

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Summary of the trade by Mohammad Ebadul Karim:

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
20000	107.90	2158000.00	1182846	331.88	392559372.60	3228772	206.84	667835989.80	3020536	233.03	703883810.20	184.68	557840094.26	208236	528.23	109995895.54

iii. Gain/Loss by Mohammad Ebadul Karim from 21.06.2022 to 12.10.2022:

Realized Capital gain(loss)per unit	48.35	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	26.18%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	146,043,715.94	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	391.37	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	74.09%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	81,497,930.06	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 Mr. Mohammad Ebadul Karim-কে মার্চ ২৭, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে Mr. Mohammad Ebadul Karim এর পক্ষে Mr. Mohiuddin Sheikh Jibon (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, I like to inform that, I have been maintaining 2 (two) nos Beneficial Owner account bearing No. 1203710046187231 and 1601880046187231 maintaining with AB Securities Limited and MTB Securities Limited respectively. As per Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 the series of transactions of shares are strictly prohibited. But unfortunately, I have made few transactions without knowing the restrictions of the Act from the period of 21 June 2022 to 12 October 2022. I do hereby inform that except those incidents I 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 I like to assure you that I will comply all the laws, rules and regulations of BSEC in future."



