



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮০/২০২২/১৩৪১

তারিখঃ অক্টোবর ১৮, ২০২২

## Mohammad Jahidul Abedin

Client Code # CM575, Client of City Brokerage Limited  
Flat # 4/D, Taj Casilina (3rd Floor) SW (I) 4  
25 Gulshan Avenue Gulshan-1, Dhaka-1212.

বিষয়: আদেশ।

কমিশনের আদেশ নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮০/২০২২/১৩৪০ তারিখ: অক্টোবর ১৮, ২০২২ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

*Rubel*  
18-10-22

রুবেল হোসেন

সহকারী পরিচালক (এনফোর্সমেন্ট)

ই-মেইল- rubel@sec.gov.bd

অবগতির জন্য অনুলিপি:

- ১। নির্বাহী পরিচালক, এমএসআই, বিএসইসি
- ২। নির্বাহী পরিচালক, এমআইএস, বিএসইসি
- ৩। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
- ৪। ব্যবস্থাপনা পরিচালক, ডিএসই।
- ৫। অফিস কপি।



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তারিখঃ অক্টোবর ১৮, ২০২২

## 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, ঢাকা স্টক এক্সচেঞ্জ লিমিটেড-এর তদন্ত কমিটি National Feed Mill Limited (NFML) এর শেয়ার লেনদেনের ১১-০৪-২০২১ থেকে ১৭-০৫-২০২১ পর্যন্ত সময়ের জন্য অনুসন্ধান (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

### Trends of closing Price and trade volume of "NFML" in public Market.

YCP of NFML as on 11.04.2021 was Tk. 15.60 and closing price of the same was Tk. 36.50 as on 17.05.2021. During this period the investigation team found that the price of NFML share was increased by Tk. 20.90 which is approximately 133.97% higher compared to YCP of 11.04.2021.

### Paramount Insurance Company Limited and its associates:

#### Observation-1:

After examining account opening form and relevant documents, it is revealed that *Paramount Insurance Company Limited and its associates* maintain 06 (Six) accounts with City Brokerage Limited, IDLC Securities Limited and United Financial Trading Company Limited. Details of these accounts are given below:

S.L.	Client's Name	Client Code	BO ID	TREC Holder's Name	Remarks
1	Paramount Insurance Company Limited	CN330	1605170071960776	City Brokerage Limited	A business unit of Paramount group
2	Paramount Insurance Company Limited	C518	1203680001152151	IDLC Securities Limited	
3	Paramount Textile Provident Fund	30825	1203110064265786	United Financial Trading Company Limited	Mohammad Jahedul Abedin is the Member Secretary of the fund
4	Paramount Textile Limited	38225	1203110068994320	United Financial Trading Company Limited	Sister Concern of Paramount Insurance Company Limited
5	Mohammad Jahidul Abedin	37450	1203110068827701	United Financial Trading Company Limited	CFO of Paramount Textile Limited
6	Mohammad Jahidul Abedin	CM575	1605170068827701	City Brokerage Limited	

Individual trade patterns, Effects of NFML in both block and public market, Trade monitoring screenshots and Gain/Loss of *Paramount Insurance Company Limited* by trading of NFML share are given below:



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## a) Individual Trade patterns of *Paramount Insurance Company Limited* and its associates in public market:

Date	Code #CN330				Code #CS18				Code #30825				Code #3825				Code #37450				Code #CMS75				Total					
	BO ID #1605170071950776				BO ID #120360001152151				BO ID #1203110064265786				BO ID #1203110060994320				BO ID #1203110068827701				BO ID #1605170068827701									
	Paramount Insurance Company Limited				Paramount Insurance Company Limited				Paramount Textile Provident Fund				Paramount Textile Limited				Mohammad Jahidul Abedin				Mohammad Jahidul Abedin									
	City Brokerage Limited				IDLC Securities Limited				United Financial Trading Company Limited				United Financial Trading Company Limited				United Financial Trading Company Limited				City Brokerage Limited									
	Buy Qty	Rate (W.Avg)	Sale Qty	Rate (W.Avg)	Buy Qty	Rate (W.Avg)	Sale Qty	Rate (W.Avg)	Buy Qty	Rate (W.Avg)	Sale Qty	Rate (W.Avg)	Buy Qty	Rate (W.Avg)	Sale Qty	Rate (W.Avg)	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
11-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	53390	15.69	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	53390	15.69	837429.00	0	0.00	0.00
13-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	34214	16.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	34214	16.00	547424.00	0	0.00	0.00
15-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	16.79	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	16.79	335741.00	0	0.00	0.00
19-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	16.86	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	16.86	843000.00	0	0.00	0.00
20-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100000	16.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100000	16.60	1660000.00	0	0.00	0.00
25-04-2021	491186	20.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	657774	20.31	0	0.00	0	0.00	0	0.00	1148960	20.39	23430530.00	0	0.00	0.00
26-04-2021	3700000	22.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3700000	22.50	0	0.00	0	0.00	0	0.00	3700000	22.50	83250000.00	0	0.00	0.00
27-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	5000000	23.21	0	0.00	10000000	23.79	0	0.00	5000000	23.79	0	0.00	0	0.00	0	0.00	20000000	23.65	47291728.30	0	0.00	0.00
28-04-2021	0	0.00	3462142	23.69	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	0	0.00	0	0.00	3462142	23.69	82031889.60	
29-04-2021	2724918	26.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	11000000	26.10	2724918	26.00	70839541.50	11000000	26.10	28710000.00
02-05-2021	0	0.00	729000	27.64	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000000	27.42	0	0.00	0	0.00	0	0.00	5000000	27.42	13707947.40	729000	27.64	20148009.40
04-05-2021	900000	27.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	11000000	27.38	0	0.00	20000000	27.49	54970421.90	0	0.00	0.00
05-05-2021	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	10000000	19.71	0	0.00	0	0.00	0	0.00	10000000	19.71	29714179.00	
06-05-2021	0	0.00	0	0.00	2160000	32.49	0	0.00	200000	30.91	0	0.00	350000	31.17	0	0.00	0	0.00	857774	33.19	0	0.00	0	0.00	27100000	32.20	87266514.00	857774	33.19	28466542.00
09-05-2021	865364	34.73	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3000000	35.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	865364	34.73	30057469.30	300000	35.00	10500000.00
11-05-2021	0	0.00	0	0.00	2160000	34.26	0	0.00	0	0.00	0	0.00	50000	31.70	249950	35.96	600000	36.20	0	0.00	0	0.00	0	0.00	6500000	35.85	23302425.00	2409950	34.44	82990640.00
12-05-2021	0	0.00	0	0.00	1900000	36.63	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	250000	35.88	0	0.00	0	0.00	0	0.00	2150000	36.55	78576050.80	0	0.00	0.00
17-05-2021	0	0.00	850000	35.90	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	0	0.00	0	0.00	850000	35.90	30515000.00	
Total	8681468	5041142	4060000	2160000	700000	0	0	0	1657604	549950	2507774	1857774	1100000	1100000	18706646	10708866														

## b) Combined effects-NFML (Both Block and Public Market) by *Paramount Insurance Company Limited* and its associates:

Opening balance: 6378373 shares

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold	
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount
	1	2	3	4	5	6		8	9
Opening Balance									
11-04-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00
12-04-2021	53390	15.69	837429.00	0	0.00	0.00	0	0.00	0.00
13-04-2021	34214	16.00	547424.00	0	0.00	0.00	0	0.00	0.00
15-04-2021	20000	16.79	335741.00	0	0.00	0.00	0	0.00	0.00
18-04-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00
19-04-2021	50000	16.86	843000.00	0	0.00	0.00	0	0.00	0.00
20-04-2021	100000	16.60	1660000.00	0	0.00	0.00	0	0.00	0.00
21-04-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00
22-04-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00
25-04-2021	2248960	19.71	44330530.00	5500000	19.03	104680000.00	0	21.06	115846604.34
26-04-2021	3700000	22.50	83250000.00	0	0.00	0.00	0	0.00	0.00
27-04-2021	2000000	23.65	47291728.30	0	0.00	0.00	0	0.00	0.00
28-04-2021	0	0.00	0.00	3462142	23.69	82031889.60	0	22.22	76917903.96
29-04-2021	2724918	26.00	70839541.50	11000000	26.10	28710000.00	0	23.45	25795854.97
02-05-2021	500000	27.42	13707947.40	729000	27.64	20148009.40	0	23.71	17282160.09
03-05-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00



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04-05-2021	2000000	27.49	54970421.90	0	0.00	0.00	0	0.00	0.00
05-05-2021	0	0.00	0.00	1000000	29.71	29714179.00	0	24.54	24544601.02
06-05-2021	2710000	32.20	87266514.00	4473774	29.93	133880542.00	0	26.48	118459824.86
09-05-2021	865364	34.73	30057469.30	300000	35.00	10500000.00	0	27.48	8244604.33
11-05-2021	650000	35.85	23302425.00	2409950	34.44	82990640.00	0	28.21	67984961.39
12-05-2021	2150000	36.55	78576050.80	0	0.00	0.00	0	0.00	0.00
16-05-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00
17-05-2021	0	0.00	0.00	850000	35.90	30515000.00	0	30.70	26091621.71
<b>Total</b>	<b>19806846</b>	<b>27.15</b>	<b>537816222.20</b>	<b>19824866</b>	<b>26.39</b>	<b>523170260.00</b>	<b>0</b>	<b>24.27</b>	<b>481168136.66</b>

Date	Stock Position			Comparison with the Market					
	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 (%)
	10	11	12	13	14	15	16	17	18
Opening Balance	6378373	21.73	138589472.58						
11-04-2021	6378373	21.73	138589472.58	738542	14.60	-6.41%	0.00%	0.00%	0.00%
12-04-2021	6431763	21.68	139426901.58	844180	15.80	8.22%	6.32%	0.00%	6.32%
13-04-2021	6465977	21.65	139974325.58	629460	16.20	2.53%	5.44%	0.00%	5.44%
15-04-2021	6485977	21.63	140310066.58	764692	16.70	3.09%	2.62%	0.00%	2.62%
18-04-2021	6485977	21.63	140310066.58	736792	16.70	0.00%	0.00%	0.00%	0.00%
19-04-2021	6535977	21.60	141153066.58	1224353	16.30	-2.40%	4.08%	0.00%	4.08%
20-04-2021	6635977	21.52	142813066.58	1397675	17.10	4.91%	7.15%	0.00%	7.15%
21-04-2021	6635977	21.52	142813066.58	1269249	17.10	0.00%	0.00%	0.00%	0.00%
22-04-2021	6635977	21.52	142813066.58	3080510	18.70	9.36%	0.00%	0.00%	0.00%
25-04-2021	3384937	21.06	71296992.24	11143444	20.50	9.63%	20.18%	49.36%	69.54%
26-04-2021	7084937	21.81	154546992.24	8329999	22.50	9.76%	44.42%	0.00%	44.42%
27-04-2021	9084937	22.22	201838720.54	21747424	24.00	6.67%	9.20%	0.00%	9.20%
28-04-2021	5622795	22.22	124920816.59	8093563	23.80	-0.83%	0.00%	42.78%	42.78%
29-04-2021	7247713	23.45	169964503.11	14664054	26.10	9.66%	18.58%	7.50%	26.08%
02-05-2021	7018713	23.71	166390290.42	14425110	26.90	3.07%	3.47%	5.05%	8.52%
03-05-2021	7018713	23.71	166390290.42	6446533	25.80	-4.09%	0.00%	0.00%	0.00%
04-05-2021	9018713	24.54	221360712.32	10141697	27.50	6.59%	19.72%	0.00%	19.72%
05-05-2021	8018713	24.54	196816111.30	13391876	30.20	9.82%	0.00%	7.47%	7.47%
06-05-2021	6254939	26.48	165622800.44	16800581	33.20	9.93%	16.13%	26.63%	42.76%
09-05-2021	6820303	27.48	187435665.42	18046867	33.10	-0.30%	4.80%	1.66%	6.46%
11-05-2021	5060353	28.21	142753129.03	14839660	36.10	9.06%	4.38%	16.24%	20.62%
12-05-2021	7210353	30.70	221329179.83	12945513	36.10	0.00%	16.61%	0.00%	16.61%
16-05-2021	7210353	30.70	221329179.83	8801140	35.70	-1.11%	0.00%	0.00%	0.00%
17-05-2021	6360353	30.70	195237558.12	10717129	36.50	2.24%	0.00%	7.93%	7.93%
<b>Total</b>	<b>6360353</b>	<b>30.70</b>	<b>195237558.12</b>						

Summary																
Block Buy			Block Sale			Total Buy		Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
1100000	19.00	20900000.00	9116000	23.05	210094000.00	19806846	27.15	537816222.20	19824866	26.39	523170260.00	24.27	481168136.66	6360353	30.70	195237558.12

**a) Trade monitoring screenshots based on public market trade by *Paramount Insurance Company Limited and its associates*):**

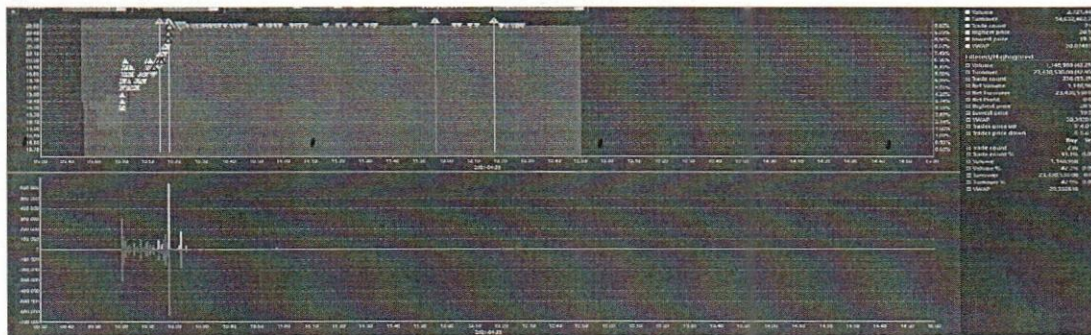
IED collected Trade monitoring screenshots from Surveillance Department on some trading dates where appearance of active trading of *Paramount Insurance Company Limited and its associates* was observed which influenced the price of NFML. After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that *Paramount Insurance Company Limited and its associates* were involved in trading of shares of NFML which influenced price of the said shares on several dates:



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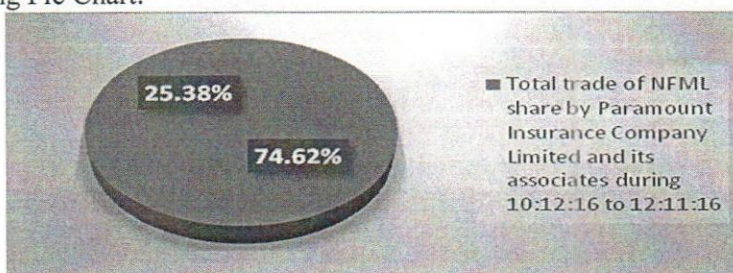
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**25-04-2021**

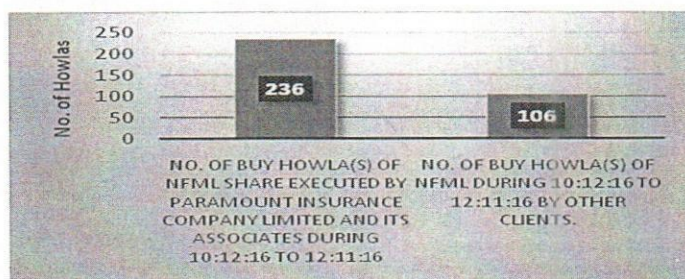


It was observed in the above graph that on 25.04.2021, total number of trades of NFML in the market was 714 whereas number of trades executed by *Paramount Insurance Company Limited and its associates* was 236 which is approximately 33.1% of the total number of trades in the market. Again, total traded volume of NFML share in the market on that day was 2,721,444 whereas buy volume by the said clients was 1,148,960 shares which is approximately 42.2% of the total traded volume in the market. It is evident that the clients had significant participation in the market on 25.04.2021 in trading of NFML share.

On 25.04.2021, trading of NFML share was started at Tk. 19.3 which is Tk. 0.6 more than the YCP of Tk. 18.7. On that day, *Paramount Insurance Company Limited and its associates* started series of trading at 10:12:16 at price Tk. 19.9 and induced the same to rise to Tk. 20.4 up to 10:17:42. After the price of NFML share being halted at Tk. 20.5 at 10:17:46, *Paramount Insurance Company Limited and its associates* continued trading of NFML share at halted price of Tk. 20.5 up to 12:11:16. It can also be observed from the above graph that the said clients executed significant trades during this time period. It is mentionable here that from 10:12:16 to 12:11:16, *Paramount Insurance Company Limited and its associates* bought 1,148,960 shares of NFML compared to the total traded share of 1,539,695. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Paramount Insurance Company Limited and its associates* executed 236 howlas to purchase of shares of NFML compared to the total number of howlas of 342 as shown in the following Bar Chart.



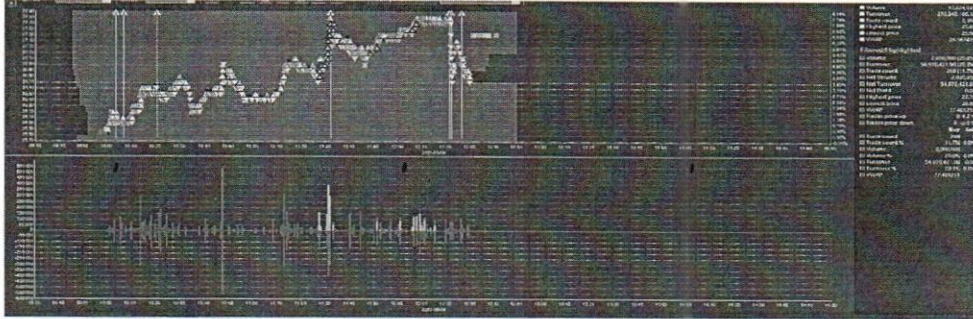
Thus it seems that *Paramount Insurance Company Limited and its associates* were actively trying to lift the price of NFML on 25.04.2021 and at the end of the day price of NFML share was increased by Tk. 1.8 which was approximately 9.6% higher than YCP.



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

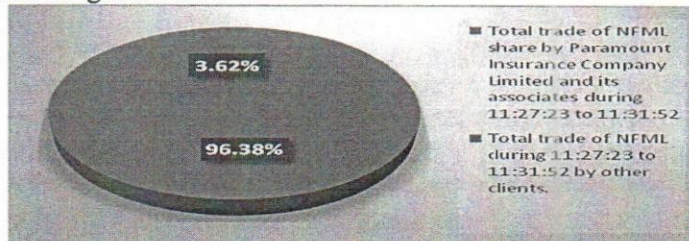
Securities Commission Bhavan, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

04-05-2021

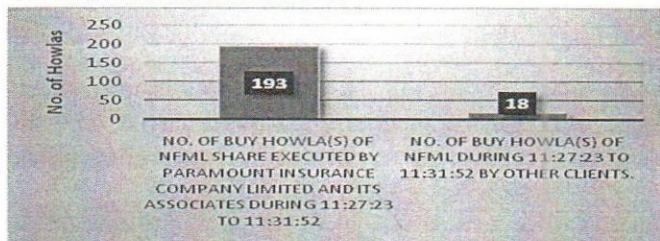


It was observed in the above graph that on 04.05.2021, total number of trades of NFML in the market was 2,306 whereas number of trades executed by *Paramount Insurance Company Limited and its associates* was 269 which is approximately 11.7% of the total number of trades in the market. Again, total traded volume of NFML share in the market on that day was 10,024,697 whereas buy volume by the said clients was 2,000,000 shares which is approximately 20.0% of the total traded volume in the market. It is evident that the clients had active participation in the market on 04.05.2021 in trading of NFML share.

On 04.05.2021, trading of NFML share was started at Tk. 25.9 which is Tk. 0.1 more than the YCP of Tk. 25.8. On that day, *Paramount Insurance Company Limited and its associates* started series of trading at 11:27:23 at price Tk. 26.8 and induced the same to rise to Tk. 27.7 up to 11:31:52. It can also be observed from the above graph that the said clients executed significant trades during this time period. It is mentionable here that from 11:27:23 to 11:31:52, *Paramount Insurance Company Limited and its associates* bought 1,047,909 shares of NFML compared to the total traded share of 1,087,267. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Paramount Insurance Company Limited and its associates* executed 193 howlas to purchase of shares of NFML compared to the total number of howlas of 211 as shown in the following Bar Chart.



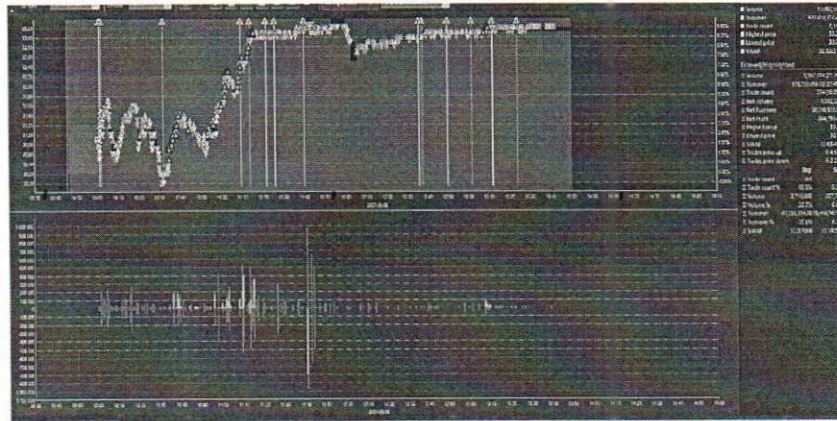
Thus it seems that *Md. Paramount Insurance Company Limited and its associates* were actively trying to lift the price of NFML on 04.05.2021 and at the end of the day price of NFML share was increased by Tk. 1.7 which was approximately 6.6% higher than YCP.



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

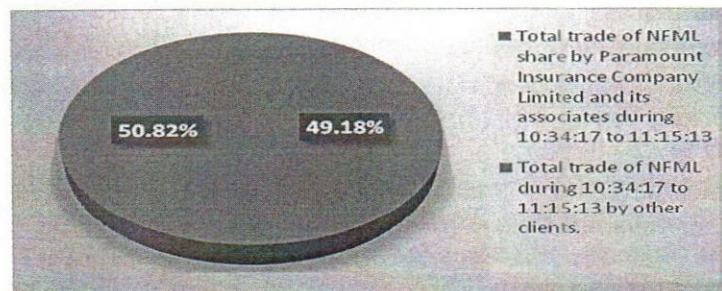
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

06-05-2021

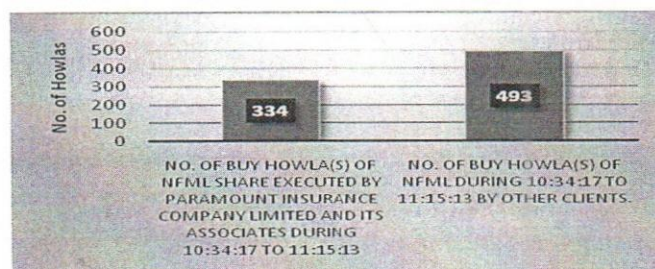


It was observed in the above graph that on 06.05.2021, total number of trades of NFML in the market was 2,339 whereas number of trades executed by *Paramount Insurance Company Limited and its associates* was 363 which is approximately 15.5% of the total number of trades in the market. Again, total traded volume of NFML share in the market on that day was 13,082,581 whereas buy volume by the said clients was 2,710,000 shares which is approximately 20.7% of the total traded volume in the market. It is evident that the clients had active participation in the market on 06.05.2021 in trading of NFML share.

On 06.05.2021, trading of NFML share was started at Tk. 30.9 which is Tk. 0.7 more than the YCP of Tk. 30.2. On that day, *Paramount Insurance Company Limited and its associates* started series of trading at 10:34:17 at price Tk. 30.5 and induced the same to rise to Tk. 33.1 up to 11:15:13. It can also be observed from the above graph that the said clients executed significant trades during this time period. It is mentionable here that from 10:34:17 to 11:15:13, *Paramount Insurance Company Limited and its associates* bought 2,550,000 shares of NFML compared to the total traded share of 5,185,386. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Paramount Insurance Company Limited and its associates* executed 334 howlas to purchase of shares of NFML compared to the total number of howlas of 827 as shown in the following Bar Chart.





# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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Thus it seems that *Paramount Insurance Company Limited and its associates* were actively trying to lift the price of NFML on 06.05.2021 and at the end of the day price of NFML share was increased by Tk. 3 which was approximately 9.9% higher than YCP.

## b) Gain/Loss of *Md. Paramount Insurance Company Limited and its associates* by trading of NFML share:

Realized Capital gain(loss)per unit	2.12	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.73%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	42002123.34	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (17-05-2021)	36.50	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	5.80	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	18.91%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	36915326.38	Quantity of Stock Position x Unrealized gain (loss) per unit

As per DSE trade data, *Paramount Insurance Company Limited and its associates* bought 19,806,846 shares and sold 19,824,866 shares of NFML during the period from 11.04.2021 to 17.05.2021 through their BO accounts with City Brokerage Limited, IDLC Securities Limited and United Financial Trading Company Limited. They collectively traded 19.70% of total trade volume and realized a capital gain of Tk. 42,002,123.34 from the trading of NFML share during the aforesaid period.

**Findings:** It seems to us that *Paramount Insurance Company Limited and its associates* executed series of transactions through the aforesaid BO accounts creating the appearance of active trading therein and also influencing the price of NFML.

**Contraventions:** As per Section 17(e)(v) 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 inducing its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is observed that the said clients were involved directly and indirectly in a series of transaction of share of NFML in order to create the appearance of active trading of the said share.

It appears that *Paramount Insurance Company Limited (BOID # 1605170071960776) and its associates* violated Section 17(e)(v) of Securities and Exchange Ordinance, 1969 by directly or indirectly executing series of transactions in the shares of NFML creating the appearance of active trading therein.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক জুন ১৬, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩২৮০/২০২২/৮৭৫ স্মারকমূলে Mohammad Jahidul Abedin-কে জুন ২৭, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mohammad Jahidul Abedin-এর নিম্নলিখিত বক্তব্য দাখিল করেন;





# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

## Explanation of Mohammad Jahidul Abedin submitted at the time of hearing:

“বিনীত নিবেদন এই যে, আমি মোহাম্মদ জাহিদুল আবেদীন, কোড # ৩৭৪৫০, বিও # ১২০৩১১০০৬৮৮২৭৭০১ ইউনাইটেড ফিন্যান্সিয়াল ট্রেডিং কোম্পানি লিমিটেড (ডিএসই ট্রেড-২২৭) এর একজন গ্রাহক। আমার আরও একটা একাউন্ট আছে, যার কোড # সিএম ৫৭৫, বিও # ১৬০৫১৭০০৬৮৮২৭৭০১ সিটি ব্রোকারেজ লিমিটেড (ডিএসই ট্রেড-১৪৫)।

আমি গত ২৫.০৪.২০২১ইং তারিখ থেকে ১৭.০৫.২০২১ইং তারিখ পর্যন্ত ইউনাইটেড ফিন্যান্সিয়াল ট্রেডিং কোম্পানি লিমিটেড এর ট্রেডারের মাধ্যমে কোড# ৩৭৪৫০ এ “NFML” শেয়ার ক্রয়-বিক্রয় করি এবং সিটি ব্রোকারেজ লিমিটেড এর ট্রেডারের মাধ্যমে কোড # সিএম ৫৭৫ “NFML” শেয়ার ক্রয়-বিক্রয় করি। আমার শেয়ার ক্রয়-বিক্রয়ের কারণে, মার্কেটে শেয়ার মূল্যে যে প্রভাব পড়বে তা আমার বোধগম্য ছিল না। আমার শেয়ার ক্রয়-বিক্রয়ের কারণে মার্কেট শেয়ার মূল্যে প্রভাব পড়বে জানতে বা বুঝতে পারলে আমি কখনই এভাবে “NFML” শেয়ার ক্রয়-বিক্রয় করতাম না। আমি আমার এই অনিচ্ছাকৃত ভুলের জন্য বিব্রত এবং ক্ষমাপ্রার্থী।

আমার এই অনিচ্ছাকৃত ভুলের জন্য আমি আন্তরিকভাবে দুঃখিত। আমি অস্বীকার করছি যে ভবিষ্যতে শেয়ার ক্রয়-বিক্রয়ের ক্ষেত্রে শেয়ার ক্রয়-বিক্রয়ের সকল নিয়ম কানুন জেনে বুঝে শেয়ার ক্রয়-বিক্রয়ে সজাগ থাকব।”

যেহেতু, Mohammad Jahidul Abedin-এর উপরোক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক সেহেতু এক্ষেত্রে Mohammad Jahidul Abedin -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mohammad Jahidul Abedin-এর উপরোক্ত কর্মকান্ডের ফলে Section 17 (e) (v) of the Securities and Exchange Ordinance, 1969 লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Mohammad Jahidul Abedin-এর উপরোক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mohammad Jahidul Abedin-কে জরিমানা করা প্রয়োজন ও সমীচীন;

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

- Mohammad Jahidul Abedin -কে ১ কোটি ২০ লক্ষ টাকা অর্থদণ্ড ধার্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে ‘বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন’ এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

  
মোঃ আবদুল হালিম  
কমিশনার

### বিতরণ:

**Mohammad Jahidul Abedin**

Client Code # CM575, Client of City Brokerage Limited

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