

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৭০

তারিখঃ মার্চ ১৯, ২০২৫

Mr. Md. Mijanur Rahman

(BOID # 1203710076132342, 1201820076099379,

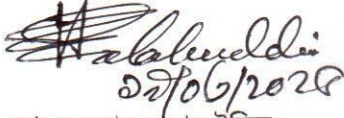
1205590076098224, 1206280076099609)

09, Gudighata Burir Khal, Barguna Sadar, Barguna.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৬৯ তারিখঃ মার্চ ১৯, ২০২৫ এর সত্যায়িত অনুলিপি
আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


১৯/০৬/২০২৫

মোঃ সুলতান সালাহ উদ্দিন


উপপরিচালক (এনফোর্সমেন্ট)

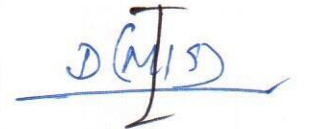
IP PABX: 88-02-09609-100600, Ext- 1220


ই-মেইল- ssuddin@sec.gov.bd

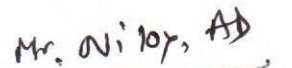
অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমএসআই, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2023-1111]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।


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Mr. Niloy, Ad

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তারিখঃ মার্চ ১৯, ২০২৫

আদেশ

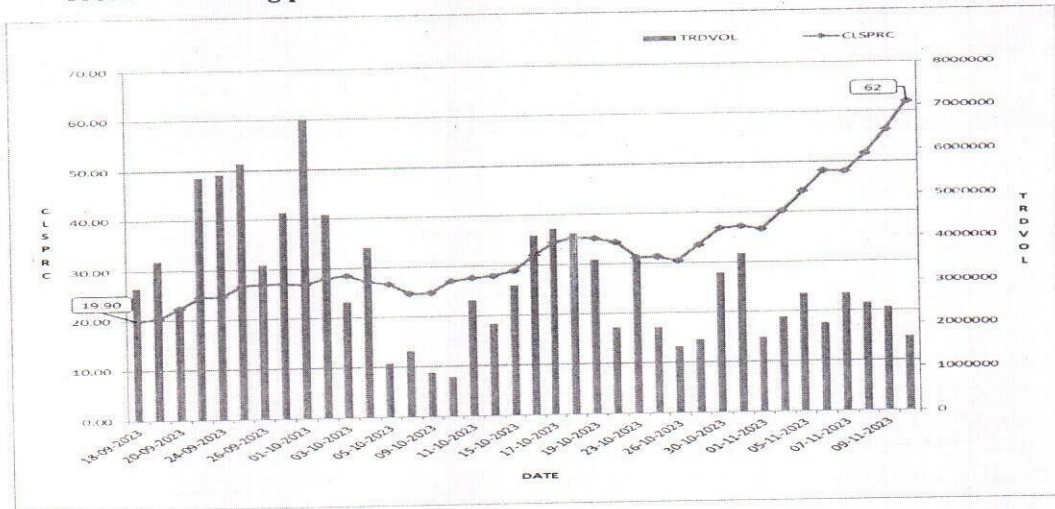
যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, নভেম্বর ১৩, ২০২৩ তারিখের DSE Surveillance Note-81/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ১৯ সেপ্টেম্বর ২০২৩ হতে ১২ নভেম্বর ২০২৩ পর্যন্ত সময়ে Khan Brothers PP Woven Bag Industries Limited (KBPPWBIL) -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:

Description of alleged violation of securities laws:

Pursuant to DSE Surveillance Note-81/2023 dated November 13, 2023 and in exercise of the power conferred by Regulation 16(3)(c)(ii) and (d)(v) of the Dhaka Stock Exchange (Board and Administration) Regulations, 2013, the investigation team of DSE investigated the share trading of Khan Brothers PP Woven Bag Industries Limited (KBPPWBIL) for the period from 19.09.2023 to 12.11.2023 and prepared this report. The investigation committee submitted the investigation report to the Commission. The investigation team randomly examined the documents collected from different TREC holders of clients regarding share trading of Khan Brothers PP Woven Bag Industries Limited. From the investigation report it appears, among others, that:

Trends of closing price and trade volume OF 'KBPPWBIL' in public market



YCP of the shares of 'KBPPWBIL' as on 19.09.2023 was Tk. 19.90 and closing price of the same was Tk. 62 as on 12.11.2023. During this period from 19.09.2023 to 12.11.2023, price of the shares of 'KBPPWBIL' was increased by Tk. 42.10 which is approximately 211.56% higher compared to closing price as on 18.09.2023

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Trading of Md. Mijanur Rahman:

Observation-1:

It is observed that *Md. Mijanur Rahman* (client code # 5820 of AB Securities Limited) was the top buyer of shares of 'KBPPWBIL' for the period from 19.09.2023 to 12.11.2023. It is found that the *Md. Mijanur Rahman* maintains 03 (three) more accounts with BRAC EPL Stock Brokerage Limited, UCB Stock Brokerage Limited and Innova Securities Limited. The details of the same are delineated as follows:

Sl. No.	Name of the BO Account Holder(s)	BOID	Client code	Name of Depository Participant
1.	Md. Mijanur Rahman	1203710076132342	5820	AB Securities Limited
2.	Md. Mijanur Rahman	1201820076099379	H01706	BRAC EPL Stock Brokerage Limited
3.	Md. Mijanur Rahman	1205590076098224	12013	UCB Stock Brokerage Limited
4.	Md. Mijanur Rahman	1206280076099609	25032	Innova Securities Limited

Individual trade pattern in public market, Effects of 'KBPPWBIL' in both block and public market, Trade monitoring screenshots and Gain/Loss of Md. Mijanur Rahman by trading of 'KBPPWBIL' share are given below:

a) Individual trade pattern of Md. Mijanur Rahman in public market:

Date	Code # 5820				Code # H01706				Code # 12013				Code # 25032				Total					
	BOID # 1203710076132342				BOID # 1201820076099379				BOID # 1205590076098224				BOID # 1206280076099609									
	Md. Mijanur Rahman				Md. Mijanur Rahman				Md. Mijanur Rahman				Md. Mijanur Rahman									
	AB Securities Limited				BRAC EPL Stock Brokerage Limited				UCB Stock Brokerage Limited				Innova Securities 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	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
26-09-2023	872346	26.97	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	872346	26.97	23530496.00	0	0.00	0.00
27-09-2023	225000	27.45	0	0.00	730447	26.98	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	955447	27.09	25884122.20	0	0.00	0.00
01-10-2023	1410000	26.84	0	0.00	8053	25.74	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1418053	26.83	38045008.10	0	0.00	0.00
02-10-2023	419268	27.39	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	419268	27.39	11482709.30	0	0.00	0.00
04-10-2023	23000	27.40	0	0.00	0	0.00	0	0.00	360000	27.55	0	0.00	115066	27.25	0	0.00	498066	27.48	13684490.40	0	0.00	0.00
05-10-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	250000	26.48	0	0.00	250000	26.48	6620000.00	0	0.00	0.00
19-10-2023	0	0.00	0	0.00	65000	34.24	0	0.00	100000	34.97	0	0.00	0	0.00	0	0.00	165000	34.68	5722582.30	0	0.00	0.00
22-10-2023	235000	34.54	0	0.00	210500	34.43	0	0.00	185000	34.77	0	0.00	291000	34.73	0	0.00	921500	34.62	31904989.80	0	0.00	0.00
23-10-2023	621000	34.65	0	0.00	15000	32.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	636000	34.59	21998736.20	0	0.00	0.00
25-10-2023	0	0.00	200000	31.70	0	0.00	0	0.00	2000	30.40	0	0.00	0	0.00	0	0.00	2000	30.40	60800.00	200000	31.70	6340000.00
26-10-2023	176000	30.57	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	176000	30.57	5380585.40	0	0.00	0.00
30-10-2023	0	0.00	0	0.00	254155	36.46	0	0.00	150000	36.23	0	0.00	50000	36.80	0	0.00	454155	36.42	16539616.80	0	0.00	0.00
31-10-2023	0	0.00	0	0.00	16845	37.00	0	0.00	385000	37.02	0	0.00	130000	36.78	0	0.00	531845	36.96	19656068.90	0	0.00	0.00
01-11-2023	30000	36.73	0	0.00	3000	36.40	0	0.00	5000	36.80	0	0.00	0	0.00	0	0.00	38000	36.72	1395200.00	0	0.00	0.00
06-11-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	65000	47.00	0	0.00	65000	47.00	3055000.00	0	0.00	0.00
Total	4011614		200000		1303000	0			1187000		0		901066		0		7402680			200000		



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b) Effects of 'KBPPWBIL' at DSE (both Public Market and Block Market) by Md. Mijanur Rahman:
Opening balance: 3,833,514 shares

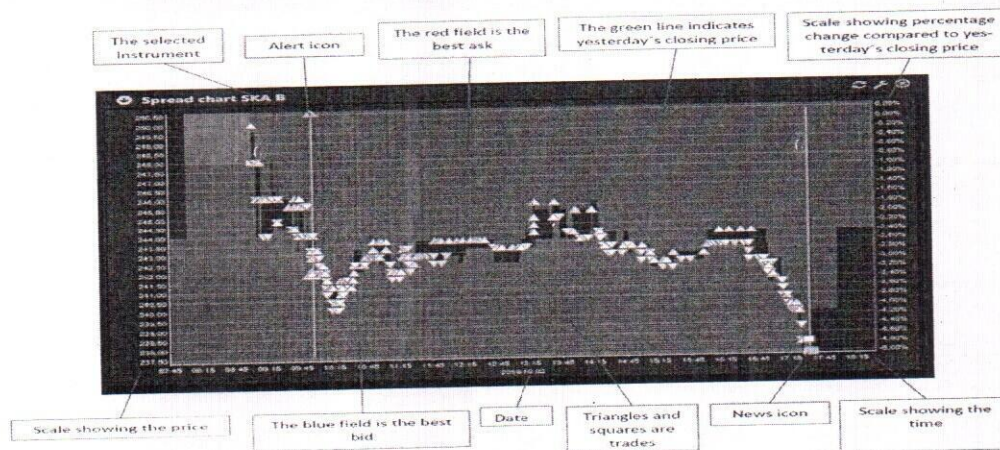
Opening balance: 3,833,514 shares

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Opening Balance										3833514	29.03	111295093.44						
26-09-2023	872346	26.97	23530496.00	0	0.00	0.00	0	0.00	0.00	4705860	28.65	134825589.44	3537167	26.90	0.75%	24.66%	0.00%	24.66%
27-09-2023	955447	27.09	25884122.20	0	0.00	0.00	0	0.00	0.00	5661307	28.39	160709711.64	4718327	27.00	0.37%	20.25%	0.00%	20.25%
01-10-2023	1418053	26.83	38045008.10	0	0.00	0.00	0	0.00	0.00	7079360	28.08	198754719.74	6869560	26.70	-1.11%	20.64%	0.00%	20.64%
02-10-2023	419268	27.39	11482709.30	0	0.00	0.00	0	0.00	0.00	7498628	28.04	210237429.04	4776730	28.10	5.24%	8.78%	0.00%	8.78%
04-10-2023	498066	27.48	13684490.40	0	0.00	0.00	0	0.00	0.00	7996694	28.00	223921919.44	3883973	27.20	-4.90%	12.82%	0.00%	12.82%
05-10-2023	250000	26.48	6620000.00	0	0.00	0.00	0	0.00	0.00	8246694	27.96	230541919.44	1222377	26.60	-2.21%	20.45%	0.00%	20.45%
19-10-2023	165000	34.68	5722582.30	0	0.00	0.00	0	0.00	0.00	8411694	28.09	236264501.74	3633173	35.10	-0.57%	4.54%	0.00%	4.54%
22-10-2023	921500	34.62	31904989.80	0	0.00	0.00	0	0.00	0.00	9333194	28.73	268169491.54	2062029	34.30	-2.28%	44.69%	0.00%	44.69%
23-10-2023	636000	34.59	21998736.20	0	0.00	0.00	0	0.00	0.00	9969194	29.11	290168227.74	3524201	31.20	-9.04%	18.05%	0.00%	18.05%
25-10-2023	2000	30.40	60800.00	200000	31.70	6340000.00	0	29.11	5821349.53	9771194	29.11	284407678.21	1950564	31.30	0.32%	0.10%	10.25%	10.36%
26-10-2023	176000	30.57	5380585.40	0	0.00	0.00	0	0.00	0.00	9947194	29.13	289788263.61	1509967	30.50	-2.56%	11.66%	0.00%	11.66%
30-10-2023	454155	36.42	16539616.80	0	0.00	0.00	0	0.00	0.00	10401349	29.45	306327880.41	3201872	36.80	9.85%	14.18%	0.00%	14.18%
31-10-2023	531845	36.96	19656068.90	0	0.00	0.00	0	0.00	0.00	10933194	29.82	325983949.31	4071774	37.20	1.09%	13.06%	0.00%	13.06%
01-11-2023	38000	36.72	1395200.00	0	0.00	0.00	0	0.00	0.00	10971194	29.84	327379149.31	1678562	36.60	-1.61%	2.26%	0.00%	2.26%
06-11-2023	65000	47.00	3055000.00	0	0.00	0.00	0	0.00	0.00	11036194	29.94	330434149.31	2111912	48.30	9.28%	3.08%	0.00%	3.08%
Total	7402680	30.39	224960405.40	200000	31.70	6340000.00	0	29.11	5821349.53	11036194	29.94	330434149.31						

c) Trade monitoring screenshots of Md. Mijanur Rahman (public market):

The Investigation Team of IED collected Trade monitoring screenshots from the Surveillance Department of DSE on some trading date(s) where appearance of active trading of Md. Mijanur Rahman was observed which influenced to uplift the price of shares of 'KBPPWBIL' during the investigation period.

The details of the graphs are given below:



- ▲ Green triangle represents trade of 'KBPPWBIL' by Md. Mijanur Rahman
- △ White triangle represents trade of shares of 'KBPPWBIL' by other clients

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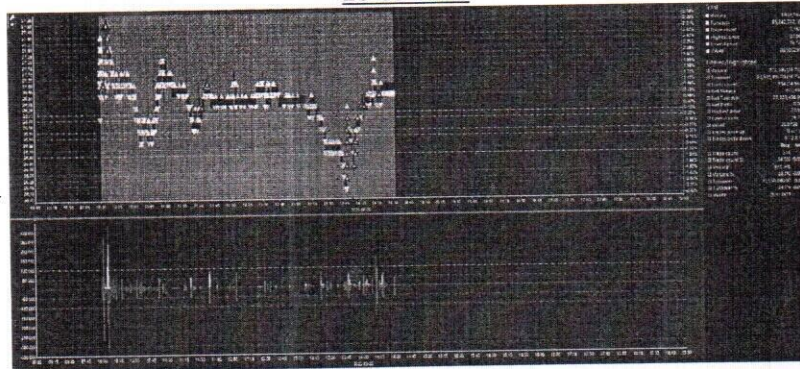
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After scrutinizing the Trade monitoring screenshots collected from Surveillance Department of DSE, it is found that *Md. Mijanur Rahman* was involved in trading of shares of 'KBPPWBIL' which influenced to uplift the price of the said securities on several dates:

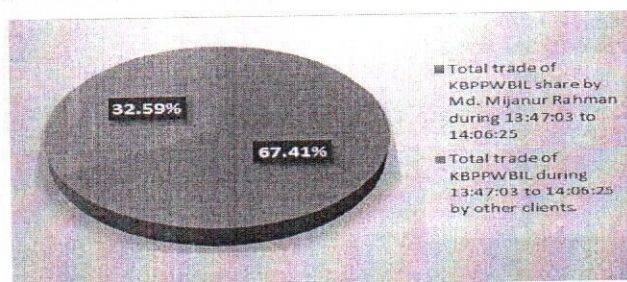
1203710076132342,1201820076099379,1205590076098224,1206280076099609 (Combined)

26-09-2023



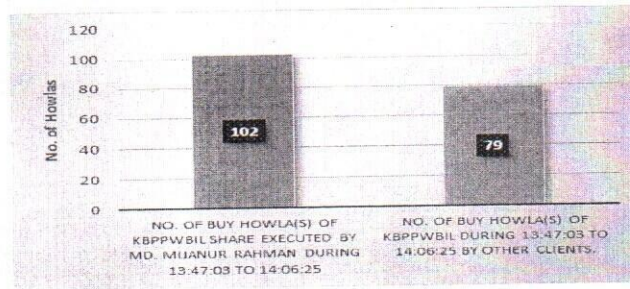
It was observed in the above graph that on 26-09-2023, total number of trades of KBPPWBIL in the market was 2162, whereas number of trades (buy) executed by *Md. Mijanur Rahman* were 314 which is approximately 14.52% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 3,537,167 whereas buy volume by the said client(s) was 872,346 which is approximately 24.66% of the total traded volume in the market.

On 26-09-2023, trading of KBPPWBIL share was started at Tk. 26.70 which is similar to the YCP of Tk. 26.70. On that day, *Md. Mijanur Rahman* started series of trading at 13:47:03 at price Tk. 26.20 and induced the same to rise to Tk. 26.80 up to 14:06:25. It can also be observed from the above graph that *Md. Mijanur Rahman* executed significant trades during this time period. It is mentionable here that from 13:47:03 to 14:06:25, *Md. Mijanur Rahman* bought 214,446 shares of KBPPWBIL compared to the total traded share of 318,143. This is shown in the following Pie Chart.



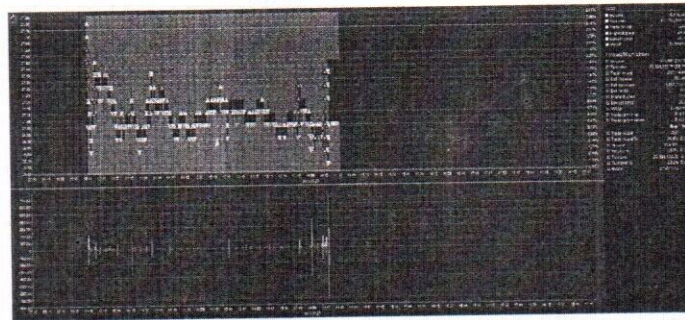
It is also found that during the aforementioned period, *Md. Mijanur Rahman* executed 102 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 181 as shown in the following Bar Chart.

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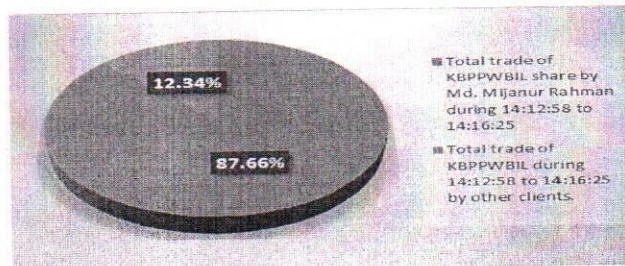
It is observed from the above graphs and screenshot that *Md. Mijanur Rahman* bought 67.41% of the total trades of KBPPWBIL shares by executing 102 of total 181 howlas from 13:47:03 to 14:06:25 on 26-09-2023. From 13:47:03 to 14:06:25, *Md. Mijanur Rahman* induced the price to rise from Tk. 26.20 to Tk. 26.80. Thus it seems that *Md. Mijanur Rahman* was actively trying to lift the price of KBPPWBIL share.

27-09-2023



It was observed in the above graph that on 27-09-2023, total number of trades of KBPPWBIL in the market was 1866, whereas number of trades (buy) executed by *Md. Mijanur Rahman* were 269 which is approximately 14.42% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 4,718,327 whereas buy volume by the said client(s) was 955,447 which is approximately 20.25% of the total traded volume in the market.

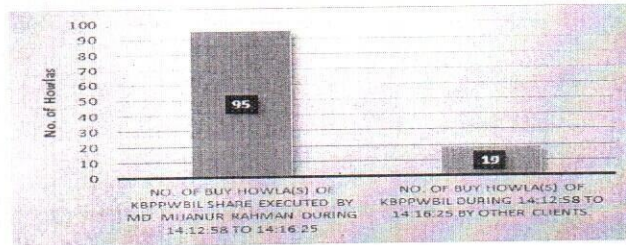
On 27-09-2023, trading of KBPPWBIL share was started at Tk. 27.00 which is Tk. 0.10 more than the YCP of Tk. 26.90. On that day, *Md. Mijanur Rahman* started series of trading at 14:12:58 at price Tk. 26.80 and induced the same to rise to Tk. 27.30 up to 14:16:25. It can also be observed from the above graph that *Md. Mijanur Rahman* executed significant trades during this time period. It is mentionable here that from 14:12:58 to 14:16:25, *Md. Mijanur Rahman* bought 218,875 shares of KBPPWBIL compared to the total traded share of 249,683. This is shown in the following Pie Chart.



(Signature)

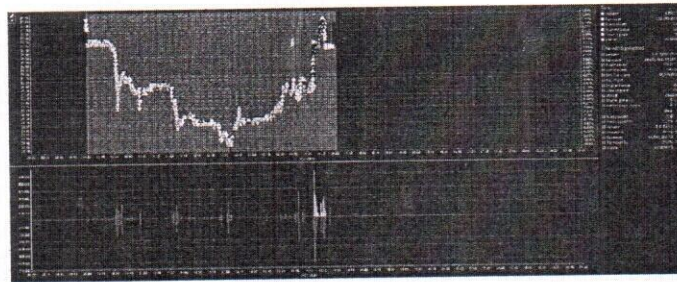
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It is also found that during the aforementioned period, *Md. Mijanur Rahman* executed 95 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 114 as shown in the following Bar Chart.



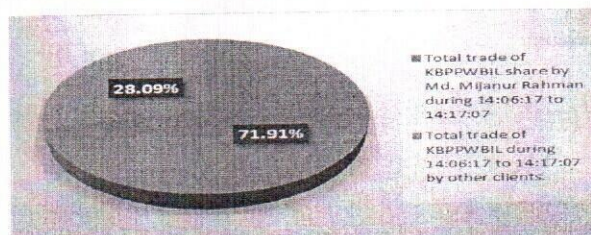
It is observed from the above graphs and screenshot that *Md. Mijanur Rahman* bought 87.66% of the total trades of KBPPWBIL shares by executing 95 of total 114 howlas from 14:12:58 to 14:16:25 on 27-09-2023. From 14:12:58 to 14:16:25, *Md. Mijanur Rahman* induced the price to rise from Tk. 26.80 to Tk. 27.30. Thus it seems that *Md. Mijanur Rahman* was actively trying to lift the price of KBPPWBIL share.

01-10-2023



It was observed in the above graph that on 01-10-2023, total number of trades of KBPPWBIL in the market was 2652, whereas number of trades (buy) executed by *Md. Mijanur Rahman* were 326 which is approximately 12.29% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 6,869,560 whereas buy volume by the said client(s) was 1,418,053 which is approximately 20.64% of the total traded volume in the market.

On 01-10-2023, trading of KBPPWBIL share was started at Tk. 27.40 which is Tk. 0.40 more than the YCP of Tk. 27.00. On that day, *Md. Mijanur Rahman* started series of trading at 14:06:17 at price Tk. 26.00 and induced the same to rise to Tk. 27.30 up to 14:17:07. It can also be observed from the above graph that *Md. Mijanur Rahman* executed significant trades during this time period. It is mentionable here that from 14:06:17 to 14:17:07, *Md. Mijanur Rahman* bought 1,338,988 shares of KBPPWBIL compared to the total traded share of 1,861,943. This is shown in the following Pie Chart.



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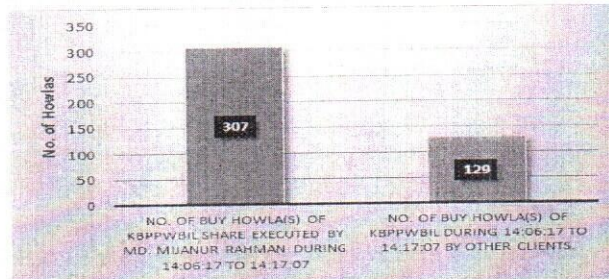
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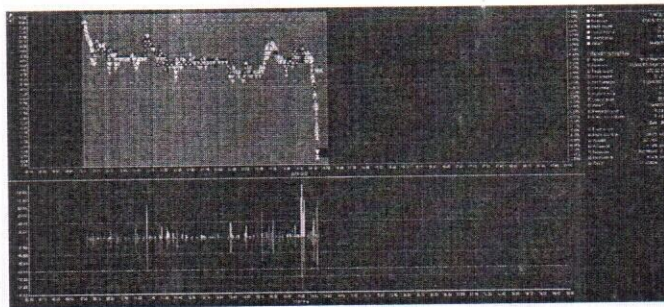
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It is also found that during the aforementioned period, *Md. Mijanur Rahman* executed 307 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 436 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that *Md. Mijanur Rahman* bought 71.91% of the total trades of KBPPWBIL shares by executing 307 of total 436 howlas from 14:06:17 to 14:17:07 on 01-10-2023. From 14:06:17 to 14:17:07, *Md. Mijanur Rahman* induced the price to rise from Tk. 26.00 to Tk. 27.30. Thus it seems that *Md. Mijanur Rahman* was actively trying to lift the price of KBPPWBIL share.

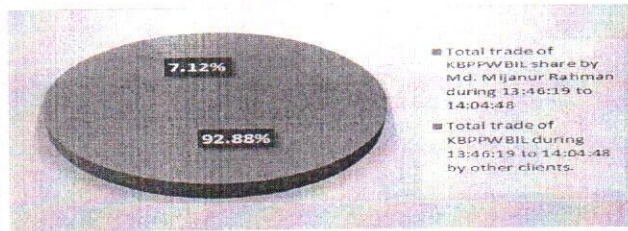
22-10-2023



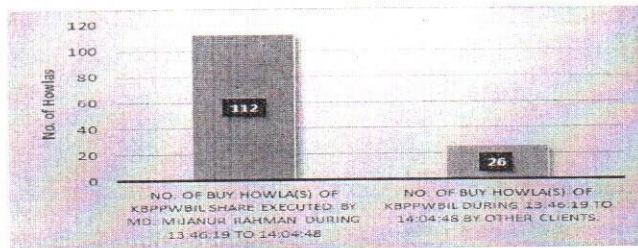
It was observed in the above graph that on 22-10-2023, total number of trades of KBPPWBIL in the market was 1266, whereas number of trades (buy) executed by *Md. Mijanur Rahman* were 375 which is approximately 29.62% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 1,962,029 whereas buy volume by the said client(s) was 921,500 which is approximately 46.97% of the total traded volume in the market. It is evident that the client had significant participation in the market on 22-10-2023 in trading of KBPPWBIL share.

On 22-10-2023, trading of KBPPWBIL share was started at Tk. 35.40 which is Tk. 0.30 more than the YCP of Tk. 35.10. On that day, *Md. Mijanur Rahman* started series of trading at 13:46:19 at price Tk. 34.20 and induced the same to rise to Tk. 34.80 up to 14:04:48. It can also be observed from the above graph that *Md. Mijanur Rahman* executed significant trades during this time period. It is mentionable here that from 13:46:19 to 14:04:48, *Md. Mijanur Rahman* bought 453,726 shares of KBPPWBIL compared to the total traded share of 488,529. This is shown in the following Pie Chart.

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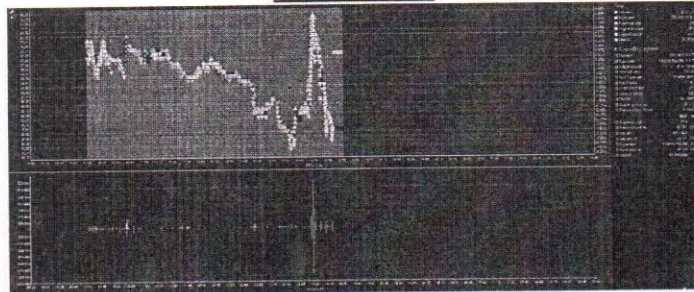


It is also found that during the aforementioned period, *Md. Mijanur Rahman* executed 112 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 138 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that *Md. Mijanur Rahman* bought 92.88% of the total trades of KBPPWBIL shares by executing 112 of total 138 howlas from 13:46:19 to 14:04:48 on 22-10-2023. From 13:46:19 to 14:04:48, *Md. Mijanur Rahman* induced the price to rise from Tk. 34.20 to Tk. 34.80. Thus it seems that *Md. Mijanur Rahman* was actively trying to lift the price of KBPPWBIL share.

31-10-2023

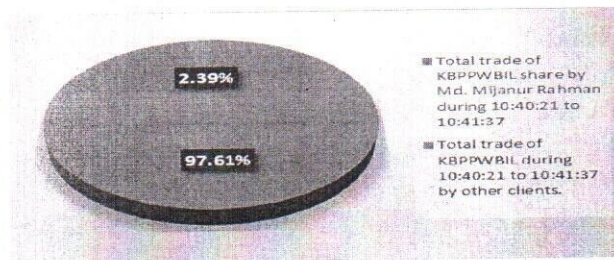


It was observed in the above graph that on 31-10-2023, total number of trades of KBPPWBIL in the market was 1981, whereas number of trades (buy) executed by *Md. Mijanur Rahman* were 216 which is approximately 10.90% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 3,621,774 whereas buy volume by the said client(s) was 531,845 which is approximately 14.68% of the total traded volume in the market.

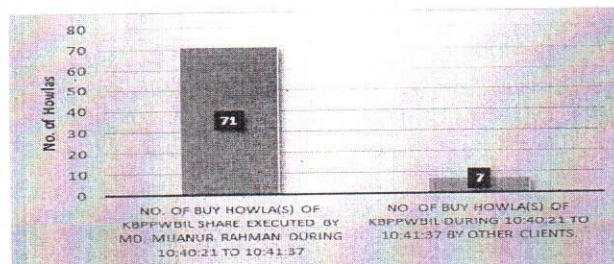
On 31-10-2023, trading of KBPPWBIL share was started at Tk. 37.50 which is Tk. 0.70 more than the YCP of Tk. 36.80. On that day, *Md. Mijanur Rahman* started series of trading at 10:40:21 at price Tk. 36.90 and induced the same to rise to Tk. 37.50 up to 10:41:37. It can also be observed from the above graph that *Md. Mijanur Rahman* executed significant trades during this time period. It is mentionable here that from 10:40:21 to 10:41:37, *Md. Mijanur Rahman* bought 204,458 shares of KBPPWBIL compared to the total traded share of 209,462. This is shown in the following Pie Chart.

[Signature]

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It is also found that during the aforementioned period, *Md. Mijanur Rahman* executed 71 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 78 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that *Md. Mijanur Rahman* bought 97.61% of the total trades of KBPPWBIL shares by executing 71 of total 78 howlas from 10:40:21 to 10:41:37 on 31-10-2023. From 10:40:21 to 10:41:37, *Md. Mijanur Rahman* induced the price to rise from Tk. 36.90 to Tk. 37.50. Thus it seems that *Md. Mijanur Rahman* was actively trying to lift the price of KBPPWBIL share.

d) Gain and Loss by *Md. Mijanur Rahman* from 19.09.2023 to 12.11.2023:

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
0	0.00	0.00	0	0.00	0.00	7402680	30.39	224960405.40	200000	31.70	6340000.00	29.11	5821349.53	11036194	29.94	330434149.31

Realized Capital gain(loss)per unit	2.59	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.91%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	5,18,650.47	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (12-11-2023)	62.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	32.06	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	107.07%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	35,38,09,878.69	Quantity of Stock Positon x Unrealized gain (loss) per unit

Client Total	76,02,680
Total Vol. of period	11,62,93,139
Percentage	6.54%

[Signature]

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As per DSE trade data, Md. Mijanur Rahman bought 7,402,680 shares from public market and sold 200,000 shares of 'KBPPWBIL' in the same market during the period from 19.09.2023 to 12.11.2023. In the investigation period, Md. Mijanur Rahman traded 6.54% shares of 'KBPPWBIL' and realized a capital gain of Tk. 518,650.47. It is also mentionable that he had unrealized gain of Tk. 353,809,878.69.

Findings:

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 Md. Mijanur Rahman was involved directly and indirectly in a series of transactions of shares of 'KBPPWBIL' with the aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

Contraventions:

It appears that Md. Mijanur Rahman (BOID # 1203710076132342) has violated the following:

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



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Observation-2:

As per instrument ledger, portfolio statements and DSE trade data of Md. Mijanur Rahman (BOID # 1203710076132342) acquired more than 10% shares of 'KBPPWBIL' on several date(s). Details are given below:

Table: Substantial (above 10%) Shareholding of KBPPWBIL by Md. Mijanur Rahman as per DSE trade data

Sl. No	Client Name	BOID	Client Code	Name of TREC Holder	23-10-2023		26-10-2023		29-10-2023		30-10-2023		31-10-2023		01-11-2023		02-11-2023	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage
1	Md. Mijanur Rahman	1203710076132342	5820	AB Securities Limited	7639128	7.79%	7615128	7.76%	7615128	7.76%	7615128	7.76%	7615128	7.76%	7645128	7.79%	7645128	7.79%
2	Md. Mijanur Rahman	1201820076099379	H01706	BRAC EPL Stock Brokerage Limited	1029000	1.05%	1029000	1.05%	1029000	1.05%	1283155	1.31%	1300000	1.33%	1303000	1.33%	1303000	1.33%
3	Md. Mijanur Rahman	1205590076098224	12013	UCB Stock Brokerage Limited	645000	0.66%	647000	0.66%	647000	0.66%	797000	0.81%	1182000	1.21%	1187000	1.21%	1187000	1.21%
4	Md. Mijanur Rahman	1206280076099609	25032	Innova Securities Limited	656066	0.67%	656066	0.67%	656066	0.67%	706066	0.72%	836066	0.85%	836066	0.85%	836066	0.85%
Total					9969194	10.16%	9947194	10.14%	9947194	10.14%	10401349	10.60%	10933194	11.15%	10971194	11.19%	10971194	11.19%
Total No. of Outstanding Securities					98,079,877.00		10.16%		10.14%		10.60%		11.15%		11.19%		11.19%	

Sl. No	Client Name	BOID	Client Code	Name of TREC Holder	05-11-2023		06-11-2023		07-11-2023		08-11-2023		09-11-2023		12-11-2023	
					Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage	Total Qty	Percentage
1	Md. Mijanur Rahman	1203710076132342	5820	AB Securities Limited	7645128	7.79%	7645128	7.79%	7645128	7.79%	7645128	7.79%	7645128	7.79%	7645128	7.79%
2	Md. Mijanur Rahman	1201820076099379	H01706	BRAC EPL Stock Brokerage Limited	1303000	1.33%	1303000	1.33%	1303000	1.33%	1303000	1.33%	1303000	1.33%	1303000	1.33%
3	Md. Mijanur Rahman	1205590076098224	12013	UCB Stock Brokerage Limited	1187000	1.21%	1187000	1.21%	1187000	1.21%	1187000	1.21%	1187000	1.21%	1187000	1.21%
4	Md. Mijanur Rahman	1206280076099609	25032	Innova Securities Limited	836066	0.85%	901066	0.92%	901066	0.92%	901066	0.92%	901066	0.92%	901066	0.92%
Total					10971194	11.19%	11036194	11.25%	11036194	11.25%	11036194	11.25%	11036194	11.25%	11036194	11.25%
Total No. of Outstanding Securities					98,079,877.00		11.19%		11.25%		11.25%		11.25%		11.25%	

From the above table, it is observed that Md. Mijanur Rahman was holding more than 10% of the total paid up shares of 'KBPPWBIL' on several date(s). It is mentionable that the above clients did not submit any declaration to the Exchange to buy more than 10% shares of 'KBPPWBIL' which specifically violates বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮।

Findings:

As per উপ-বিধি (১)(ক) of বিধি ২ of the 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.....”

And as per বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮



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“এক্সচেঞ্জ হইতে নগদ অর্থের বিনিময়ে উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন বা অধিগ্রহণ। (১) কোন কোম্পানিতে উল্লেখযোগ্য সংখ্যক এর কম কোন শেয়ারের ধারক বা ধারকগণ, বা যিনি বা যাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিগণ, 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।”

Whereas, it is found that Md. Mijanur Rahman acquired more than 10% shares of 'KBPPWBIL' on several date(s) without submitting any declaration to the Exchange.

Contravention(s):

It appears that Md. Mijanur Rahman has violated the following:

- বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of 'KBPPWBIL' without declaration.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক ফেব্রুয়ারি ১২, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭/২০২৩/১৪৩ স্মারকমূলে Mr. Md. Mijanur Rahman-কে ফেব্রুয়ারি ২৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে নির্ধারিত তারিখে শুনানীতে Mr. Md. Mijanur Rahman এর পক্ষে Mr. Mohiuddin Sheikh Jibon (on behalf) উপস্থিত হয়ে ফেব্রুয়ারি ২৯, ২০২৪ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

“With reference to your letter No. BSEC/Enforcement/3477/2023/143, Dated 12 February 2024 on the above subject, I like to inform that, I have been maintaining 4 (four) nos. of Beneficial Owner account bearing No. 1203710076132342, 1201820076099379, 1205590076098224 and 1206280076099609 maintaining with AB Securities Limited, Brac EPL, Stock Brokerage Limited, UCB Stock Brokerage Limited and Innova Securities Limited. As per Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 the series of transactions of shares and trade of shares by creating false and misleading appearance while trading in that security and as per sub rules (০১) (ক) and rules ০৪ (০১) any associates collectively hold more than 10% shares without declaration are strictly prohibited. But unfortunately, I have made few transactions without knowing the restrictions of the law from the period of 19 September 2023 to 12 November 2023. 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.”

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যেহেতু, Mr. Md. Mijanur Rahman-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mr. Md. Mijanur Rahman-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Md. Mijanur Rahman-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

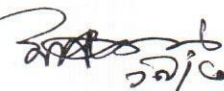
যেহেতু, Mr. Md. Mijanur Rahman-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Md. Mijanur Rahman-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 বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত ক্ষমতাবলে-

- Mr. Md. Mijanur Rahman-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ৪.০০ (চার) লক্ষ টাকা এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা [মোট ৫.০০ (পাঁচ) লক্ষ টাকা] অর্থদন্ড 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,


১৯/৩/২০২৪
মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Mr. Md. Mijanur Rahman

(BOID # 1203710076132342, 1201820076099379,

1205590076098224, 1206280076099609)

09, Gudighata Burir Khal, Barguna Sadar, Barguna.