

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৭২

তারিখঃ মার্চ ১৯, ২০২৫

Mr. Md. Nasir Uddin Akond

(BOID # 1203710076132286, 1201820076102324,
1202090076130551, 1205590076098283)

House: Ahond Bari, Vill: Kandapasha

PS: Gouronadi, Dist: Barishal

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪৭৭(২)/২০২৩/৩৭১ তারিখঃ মার্চ ১৯, ২০২৫ এর সত্যায়িত অনুলিপি
আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,



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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তারিখঃ মার্চ ১৯, ২০২৫

আদেশ

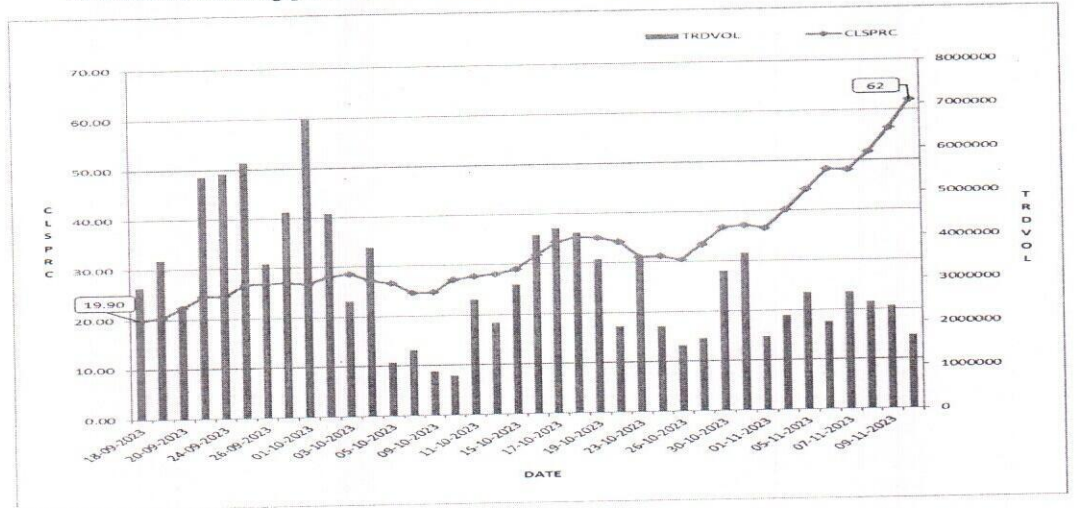
যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

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. Nasir Uddin Akond:

Observation-1:

It is observed that *Md. Nasir Uddin Akond* (client code # 5821 of AB Securities Limited) was one of the top buyers of shares of 'KBPPWBIL' for the period from 19.09.2023 to 12.11.2023. It is found that *Md. Nasir Uddin Akond* 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. Nasir Uddin Akond | 1203710076132286 | 5821 | AB Securities Limited |
| 2. | Md. Nasir Uddin Akond | 1201820076102324 | HO1707 | BRAC EPL Stock Brokerage Limited |
| 3. | Md. Nasir Uddin Akond | 1202090076130551 | H1068 | NCCB Securities and Financial Services Limited |
| 4. | Md. Nasir Uddin Akond | 1205590076098283 | 12014 | UCB Stock Brokerage Limited |

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

a) Individual trade pattern of Md. Nasir Uddin Akond in public market:

| Date | Code #5821 | | | | Code #H01707 | | | | Code #H1068 | | | | Code #12014 | | | | Total | | | | | |
|------------|------------------------|---------------|-----------|---------------|----------------------------------|---------------|-----------|---------------|--|---------------|-----------|---------------|-----------------------------|---------------|-----------|---------------|---------|------------------|-------------|-----------|--------------------|----------|
| | BOID #1203710076132286 | | | | BOID #1201820076102324 | | | | BOID #1202090076130551 | | | | BOID #1205590076098283 | | | | | | | | | |
| | Md. Nasir Uddin Akond | | | | Md Nasir Uddin Akond | | | | Md Nasir Uddin Akond | | | | Md Nasir Uddin Akond | | | | | | | | | |
| | AB Securities Limited | | | | BRAC EPL Stock Brokerage Limited | | | | NCCB Securities and Financial Services Limited | | | | UCB Stock Brokerage Limited | | | | | | | | | |
| | Buy Qty | Rate (W.Avg.) | Sale Qty. | Rate (W.Avg.) | BuyQty | Rate (W.Avg.) | Sale Qty. | Rate (W.Avg.) | BuyQty | Rate (W.Avg.) | Sale Qty. | Rate (W.Avg.) | BuyQty | Rate (W.Avg.) | Sale Qty. | Rate (W.Avg.) | BuyQty | BuyRate (W.Avg.) | Total | Sale Qty. | Sale Rate (W.Avg.) | Total |
| 27-09-2023 | 500000 | 27.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 500000 | 27.00 | 13500000.00 | 0 | 0.00 | 0.00 |
| 01-10-2023 | 600000 | 26.20 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 600000 | 26.20 | 15722597.50 | 0 | 0.00 | 0.00 |
| 02-10-2023 | 143500 | 27.86 | 528 | 27.20 | 600000 | 28.31 | 0 | 0.00 | 326191 | 27.76 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 1059691 | 28.08 | 30038667.30 | 528 | 27.20 | 14361.60 |
| 03-10-2023 | 371425 | 28.41 | 0 | 0.00 | 103000 | 28.40 | 0 | 0.00 | 262821 | 28.39 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 737246 | 28.40 | 20937395.00 | 0 | 0.00 | 0.00 |
| 04-10-2023 | 190000 | 27.44 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 360000 | 27.67 | 0 | 0.00 | 550000 | 27.59 | 15174323.30 | 0 | 0.00 | 0.00 |
| 09-10-2023 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 120000 | 24.78 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 120000 | 24.78 | 2973874.80 | 0 | 0.00 | 0.00 |
| 11-10-2023 | 343596 | 27.66 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 343596 | 27.66 | 9502236.10 | 0 | 0.00 | 0.00 |
| 12-10-2023 | 40036 | 27.70 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 40036 | 27.70 | 1108993.60 | 0 | 0.00 | 0.00 |
| 15-10-2023 | 85000 | 29.04 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 85000 | 29.04 | 2468540.70 | 0 | 0.00 | 0.00 |
| 17-10-2023 | 513192 | 34.25 | 0 | 0.00 | 575000 | 34.44 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 1088192 | 34.35 | 37379368.50 | 0 | 0.00 | 0.00 |
| 18-10-2023 | 531000 | 34.67 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 236209 | 34.95 | 0 | 0.00 | 280000 | 35.34 | 0 | 0.00 | 1047209 | 34.91 | 36562384.30 | 0 | 0.00 | 0.00 |
| 19-10-2023 | 288000 | 35.16 | 0 | 0.00 | 3700 | 34.50 | 0 | 0.00 | 343149 | 35.16 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 634849 | 35.16 | 22318687.80 | 0 | 0.00 | 0.00 |
| 22-10-2023 | 84000 | 34.36 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 608 | 34.52 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 84608 | 34.36 | 2907387.10 | 0 | 0.00 | 0.00 |
| 23-10-2023 | 20000 | 31.40 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 173 | 31.84 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 20173 | 31.40 | 633507.90 | 0 | 0.00 | 0.00 |
| 25-10-2023 | 5000 | 29.90 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 123 | 31.41 | 0 | 0.00 | 2000 | 30.30 | 0 | 0.00 | 7123 | 30.04 | 213963.10 | 0 | 0.00 | 0.00 |
| 31-10-2023 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 265008 | 37.42 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 265008 | 37.42 | 9915837.80 | 0 | 0.00 | 0.00 |
| Total | 3714749 | | 528 | | 1281700 | | 0 | | 1554282 | | 0 | | 642000 | | 0 | | 7192731 | | | 528 | | |

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b) Effects of 'KBPPWBIL' at DSE (both Public Market and Block Market) by Md. Nasir Uddin Akond:

Opening balance: 3,184,221 shares

| Date | Buy | | | Sale | | | Bonus Share Credited | 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 (%) |
| | 1 | 2 | 3 | 4 | 5 | 6 | | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
| Opening Balance | | | | | | | | | | 3184221 | 30.73 | 97838005.40 | | | | | | |
| 27-09-2023 | 500000 | 27.00 | 13500000.00 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 3684221 | 30.22 | 111338005.40 | 4718327 | 27.00 | 0.37% | 10.60% | 0.00% | 10.60% |
| 01-10-2023 | 600000 | 26.20 | 15722597.50 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 4284221 | 29.66 | 127060602.90 | 6869560 | 26.70 | -1.11% | 8.73% | 0.00% | 8.73% |
| 02-10-2023 | 1069691 | 28.08 | 30038667.30 | 528 | 27.20 | 14361.60 | 0 | 29.34 | 15493.05 | 5353384 | 29.34 | 157083777.15 | 4776730 | 28.10 | 5.24% | 22.39% | 0.01% | 22.40% |
| 03-10-2023 | 737246 | 28.40 | 20937395.00 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6090630 | 29.23 | 178021172.15 | 2643292 | 28.60 | 1.78% | 27.89% | 0.00% | 27.89% |
| 04-10-2023 | 550000 | 27.59 | 15174323.30 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6640630 | 29.09 | 193195495.45 | 3883973 | 27.20 | -4.90% | 14.16% | 0.00% | 14.16% |
| 09-10-2023 | 120000 | 24.78 | 2973874.80 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6760630 | 29.02 | 196169370.25 | 1001884 | 24.70 | 0.41% | 11.98% | 0.00% | 11.98% |
| 10-10-2023 | 0 | 0.00 | 0.00 | 530000 | 23.47 | 12440000.00 | 0 | 29.02 | 15378709.71 | 6230630 | 29.02 | 180790660.54 | 1423825 | 27.10 | 9.72% | 0.00% | 37.22% | 37.22% |
| 11-10-2023 | 343596 | 27.66 | 9502236.10 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6574226 | 28.95 | 190292896.64 | 3134814 | 27.70 | 2.21% | 10.96% | 0.00% | 10.96% |
| 12-10-2023 | 40036 | 27.70 | 1108993.60 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6614262 | 28.94 | 191401890.24 | 2135820 | 28.10 | 1.44% | 1.87% | 0.00% | 1.87% |
| 15-10-2023 | 85000 | 29.04 | 2468540.70 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 6699262 | 28.94 | 193870430.94 | 2961977 | 29.00 | 3.20% | 2.87% | 0.00% | 2.87% |
| 17-10-2023 | 1088192 | 34.35 | 37379368.50 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 7787454 | 29.70 | 231249799.44 | 4840819 | 34.40 | 7.84% | 22.48% | 0.00% | 22.48% |
| 18-10-2023 | 1047209 | 34.91 | 36562384.30 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 8834663 | 30.31 | 267812183.74 | 4142517 | 35.30 | 2.62% | 25.28% | 0.00% | 25.28% |
| 19-10-2023 | 634849 | 35.16 | 22318687.80 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 9469512 | 30.64 | 290130871.54 | 3633173 | 35.10 | -0.57% | 17.47% | 0.00% | 17.47% |
| 22-10-2023 | 84608 | 34.36 | 2907387.10 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 9554120 | 30.67 | 293038258.64 | 2062029 | 34.30 | -2.28% | 4.10% | 0.00% | 4.10% |
| 23-10-2023 | 20173 | 31.40 | 633507.90 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 9574293 | 30.67 | 293671766.54 | 3524201 | 31.20 | -9.04% | 0.57% | 0.00% | 0.57% |
| 25-10-2023 | 7123 | 30.04 | 213963.10 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 9581416 | 30.67 | 293885729.64 | 1950564 | 31.30 | 0.32% | 0.37% | 0.00% | 0.37% |
| 31-10-2023 | 265008 | 37.42 | 9915837.80 | 0 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 9846424 | 30.85 | 303801567.44 | 4071774 | 37.20 | 1.09% | 6.51% | 0.00% | 6.51% |
| Total | 7192731 | 30.78 | 221357764.80 | 530528 | 23.48 | 12454361.60 | 0 | 29.02 | 15394202.76 | 9846424 | 30.85 | 303801567.44 | | | | | | |

a) Trade monitoring screenshots of Md. Nasir Uddin Akond (public market):

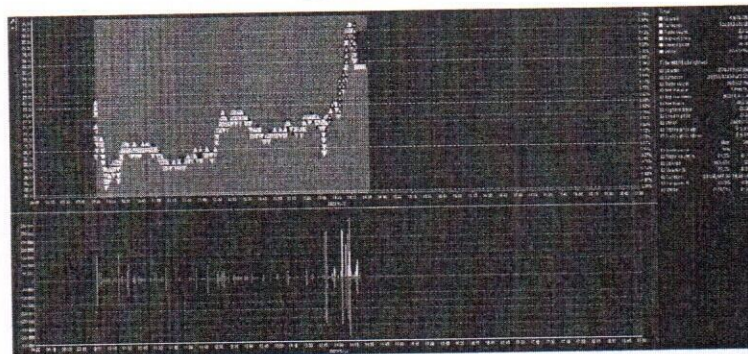
The Investigation Team of IED collected Trade monitoring screenshots from the Surveillance Department of DSE on some trading date(s) where appearance of active trading of Md. Nasir Uddin Akond was observed which influenced to uplift the price of shares of 'KBPPWBIL' during the investigation period.

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

1203710076132286,1201820076102324,1202090076130551,1205590076098283

(Combined)

02-10-2023

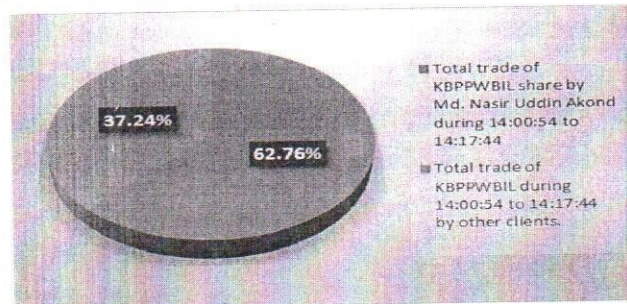


(Handwritten signature)

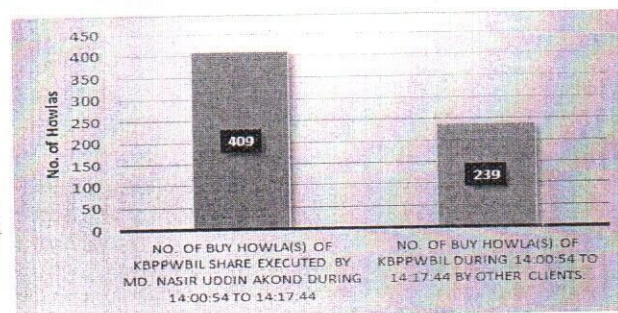
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It was observed in the above graph that on 02-10-2023, total number of trades of KBPPWBIL in the market was 2312, whereas number of trades (buy) executed by *Md. Nasir Uddin Akond* were 506 which is approximately 21.89% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 4,676,730 whereas buy volume by the said client(s) was 1,069,691 which is approximately 22.87% of the total traded volume in the market.

On 02-10-2023, trading of KBPPWBIL share was started at Tk. 26.70 which is similar to the YCP of Tk. 26.70. On that day, *Md. Nasir Uddin Akond* started series of trading at 14:00:54 at price Tk. 27.30 and induced the same to rise to Tk. 28.60 up to 14:17:44. It can also be observed from the above graph that *Md. Nasir Uddin Akond* executed significant trades during this time period. It is mentionable here that from 14:00:54 to 14:17:44, *Md. Nasir Uddin Akond* bought 832,964 shares of KBPPWBIL compared to the total traded share of 1,327,170. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Md. Nasir Uddin Akond* executed 409 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 648 as shown in the following Bar Chart.

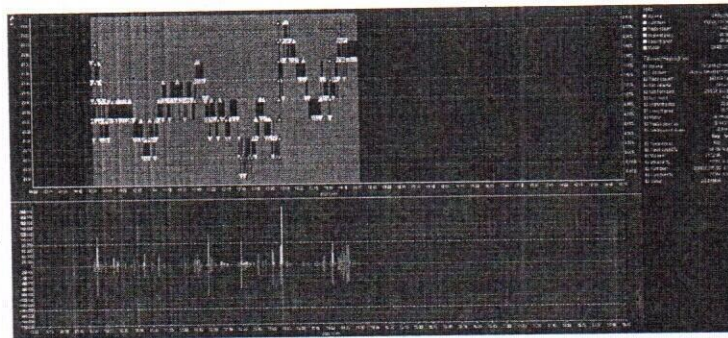


It is observed from the above graphs and screenshot that *Md. Nasir Uddin Akond* bought 62.76% of the total trades of KBPPWBIL shares by executing 409 of total 648 howlas from 14:00:54 to 14:17:44 on 02-10-2023. From 14:00:54 to 14:17:44, *Md. Nasir Uddin Akond* induced the price to rise from Tk. 27.30 to Tk. 28.60. Thus it seems that *Md. Nasir Uddin Akond* was actively trying to lift the price of KBPPWBIL share. At the end of the day price of KBPPWBIL share was increased by Tk. 1.40 which is approximately 5.24% higher than YCP.

A

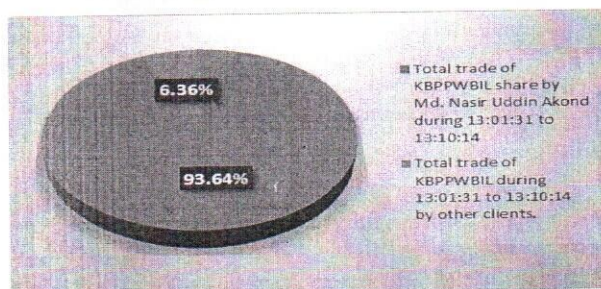
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03-10-2023

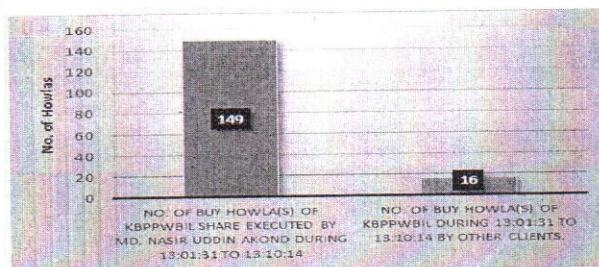


It was observed in the above graph that on 03-10-2023, total number of trades of KBPPWBIL in the market was 1823, whereas number of trades (buy) executed by *Md. Nasir Uddin Akond* were 348 which is approximately 19.09% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 2,643,292 whereas buy volume by the said client(s) was 737,246 which is approximately 27.89% of the total traded volume in the market. It is evident that the client had significant participation in the market on 03-10-2023 in trading of KBPPWBIL share.

On 03-10-2023, trading of KBPPWBIL share was started at Tk. 28.60 which is Tk. 0.50 more than the YCP of Tk. 28.10. On that day, *Md. Nasir Uddin Akond* started series of trading at 13:01:31 at price Tk. 28.10 and induced the same to rise to Tk. 28.80 up to 13:10:14. It can also be observed from the above graph that *Md. Nasir Uddin Akond* executed significant trades during this time period. It is mentionable here that from 13:01:31 to 13:10:14, *Md. Nasir Uddin Akond* bought 322,823 shares of KBPPWBIL compared to the total traded share of 344,756. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Md. Nasir Uddin Akond* executed 149 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 165 as shown in the following Bar Chart.



(Signature)

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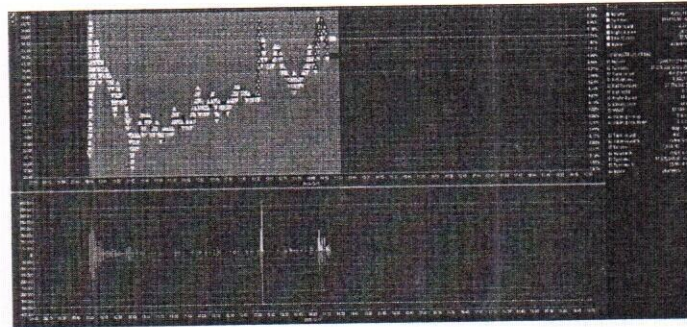
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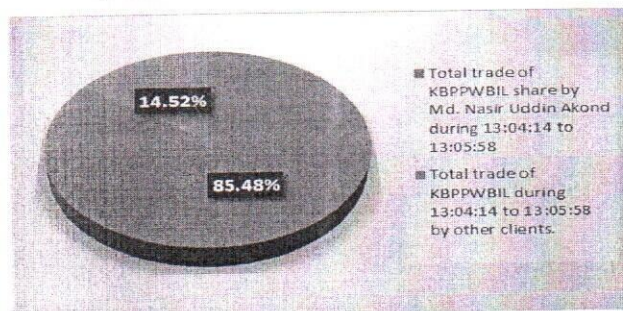
It is observed from the above graphs and screenshot that *Md. Nasir Uddin Akond* bought 93.64% of the total trades of KBPPWBIL shares by executing 149 of total 165 howlas from 13:01:31 to 13:10:14 on 03-10-2023. From 13:01:31 to 13:10:14, *Md. Nasir Uddin Akond* induced the price to rise from Tk. 28.10 to Tk. 28.80. Thus it seems that *Md. Nasir Uddin Akond* was actively trying to lift the price of KBPPWBIL share.

17-10-2023



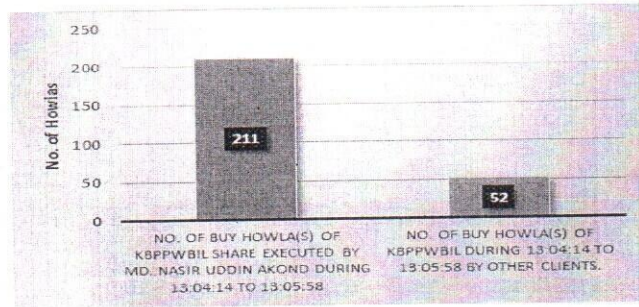
It was observed in the above graph that on 17-10-2023, total number of trades of KBPPWBIL in the market was 2577, whereas number of trades (buy) executed by *Md. Nasir Uddin Akond* were 410 which is approximately 15.91% of the total number of trades in the market. Again, total traded volume of KBPPWBIL in the market on that day was 4,252,719 whereas buy volume by the said client(s) was 1,088,192 which is approximately 25.59% of the total traded volume in the market.

On 17-10-2023, trading of KBPPWBIL share was started at Tk. 32.80 which is Tk. 0.90 more than the YCP of Tk. 31.90. On that day, *Md. Nasir Uddin Akond* started series of trading at 13:04:14 at price Tk. 33.60 and induced the same to rise to Tk. 34.70 up to 13:05:58. It can also be observed from the above graph that *Md. Nasir Uddin Akond* executed significant trades during this time period. It is mentionable here that from 13:04:14 to 13:05:58, *Md. Nasir Uddin Akond* bought 470,995 shares of KBPPWBIL compared to the total traded share of 551,028. This is shown in the following Pie Chart.



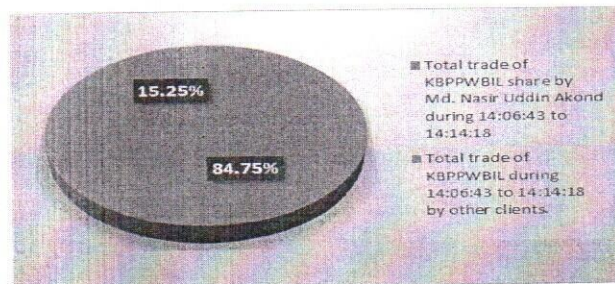
It is also found that during the aforementioned period, *Md. Nasir Uddin Akond* executed 211 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 263 as shown in the following Bar Chart.

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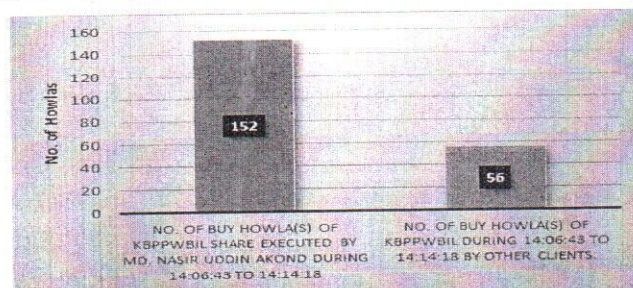


It is observed from the above graphs and screenshot that *Md. Nasir Uddin Akond* bought 85.48% of the total trades of KBPPWBIL shares by executing 211 of total 263 howlas from 13:04:14 to 13:05:58 on 17-10-2023. From 13:04:14 to 13:05:58, *Md. Nasir Uddin Akond* induced the price to rise from Tk. 33.60 to Tk. 34.70.

Again, on the same day, *Md. Nasir Uddin Akond* started series of trading at 14:06:43 at price Tk. 34.00 and induced the same to rise to Tk. 34.70 up to 14:14:18. It can also be observed from the above graph that *Md. Nasir Uddin Akond* executed significant trades during this time period. It is mentionable here that from 14:06:43 to 14:14:18, *Md. Nasir Uddin Akond* bought 496,550 shares of KBPPWBIL compared to the total traded share of 585,877. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Md. Nasir Uddin Akond* executed 152 howlas to purchase of shares of KBPPWBIL compared to the total number of howlas of 208 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that *Md. Nasir Uddin Akond* bought 84.75% of the total trades of KBPPWBIL shares by executing 152 of total 208 howlas from 14:06:43 to 14:14:18 on 17-10-2023. From 14:06:43 to 14:14:18, *Md. Nasir Uddin Akond* induced the price to rise from Tk. 34.00 to Tk. 34.70. Thus it seems that *Md. Nasir Uddin Akond* was actively trying to lift the price of KBPPWBIL share. At the end of the day price of KBPPWBIL share was increased by Tk. 2.50 which is approximately 7.84% higher than YCP.

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b) Gain and Loss by Md. Nasir Uddin Akond 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 | 530000 | 23.47 | 12440000.00 | 7192731 | 30.78 | 221357764.80 | 530528 | 23.48 | 12454361.60 | 29.02 | 15394202.76 | 9846424 | 30.85 | 303801567.44 |

| | | |
|-------------------------------------|-----------------|--|
| Realized Capital gain(loss)per unit | -5.54 | Average Sale Price - Average Cost Price |
| Realized Capital gain(loss)% | -19.10% | Gain (loss) Per Unit/Cost Per Unit |
| Realized Capital gain(loss)TK | -29,39,841.16 | 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 | 31.15 | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) % | 100.95% | Unrealized gain (loss) per unit /Average Price of Stock Position |
| Unrealized gain(loss) TK | 30,66,76,720.56 | Quantity of Stock Position x Unrealized gain (loss) per unit |

| | |
|----------------------|-----------|
| Client Total | 7723259 |
| Total Vol. of period | 116293139 |
| Percentage | 6.64% |

As per DSE trade data, Md. Nasir Uddin Akond bought 7,192,731 shares from public market and sold 530,528 shares of 'KBPPWBIL' in both public and block market during the period from 19.09.2023 to 12.11.2023. In the investigation period, Md. Nasir Uddin Akond traded 6.64% shares of 'KBPPWBIL' and realized a capital loss of Tk. 2,939,841.16. It is also mentionable that he had unrealized gain of Tk. 306,676,720.56.

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. Nasir Uddin Akond 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.



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Contraventions:

It appears that *Md. Nasir Uddin Akond* (BOID # 1203710076132286) 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.

Observation-2:

As per ledger, instrument ledger, portfolio statements and DSE trade data of *Md. Nasir Uddin Akond* (BOID # 1203710076132286) acquired more than 10% shares of 'KBPPWBIL' on several date(s). Details are given below:

Table: Substantial (above 10%) Shareholding of KBPPWBIL by *Md. Nasir Uddin Akond* as per DSE trade data

| Sl. No | Client Name | BO ID | Client Code | Name of TREC Holder | 31-10-2023 | | 01-11-2023 | | 02-11-2023 | | 05-11-2023 | | 06-11-2023 | |
|-------------------------------------|-----------------------|------------------|-------------|--|---------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| | | | | | Total Qty | Percentage | Total Qty | Percentage | Total Qty | Percentage | Total Qty | Percentage | Total Qty | Percentage |
| 1 | Md. Nasir Uddin Akond | 1203710076132286 | 5821 | AB Securities Limited | 6368442 | 6.49% | 6368442 | 6.49% | 6368442 | 6.49% | 6368442 | 6.49% | 6368442 | 6.49% |
| 2 | Md Nasir Uddin Akond | 1201820076102324 | HO1707 | BRAC EPL Stock Brokerage Limited | 1281700 | 1.31% | 1281700 | 1.31% | 1281700 | 1.31% | 1281700 | 1.31% | 1281700 | 1.31% |
| 3 | Md Nasir Uddin Akond | 1202090076130551 | H1068 | NCCB Securities and Financial Services Limited | 1554282 | 1.58% | 1554282 | 1.58% | 1554282 | 1.58% | 1554282 | 1.58% | 1554282 | 1.58% |
| 4 | Md Nasir Uddin Akond | 1205590076098283 | 12014 | UCB Stock Brokerage Limited | 642000 | 0.65% | 642000 | 0.65% | 642000 | 0.65% | 642000 | 0.65% | 642000 | 0.65% |
| Total | | | | | 9846424 | 10.04% | 9846424 | 10.04% | 9846424 | 10.04% | 9846424 | 10.04% | 9846424 | 10.04% |
| Total No. of Outstanding Securities | | | | | 98,079,877.00 | 10.04% | | 10.04% | | 10.04% | | 10.04% | | 10.04% |

| Sl. No | Client Name | BO ID | Client Code | Name of TREC Holder | 07-11-2023 | | 08-11-2023 | | 09-11-2023 | | 12-11-2023 | |
|-------------------------------------|-----------------------|------------------|-------------|--|---------------|------------|------------|------------|------------|------------|------------|------------|
| | | | | | Total Qty | Percentage | Total Qty | Percentage | Total Qty | Percentage | Total Qty | Percentage |
| 1 | Md. Nasir Uddin Akond | 1203710076132286 | 5821 | AB Securities Limited | 6368442 | 6.49% | 6368442 | 6.49% | 6368442 | 6.49% | 6368442 | 6.49% |
| 2 | Md Nasir Uddin Akond | 1201820076102324 | HO1707 | BRAC EPL Stock Brokerage Limited | 1281700 | 1.31% | 1281700 | 1.31% | 1281700 | 1.31% | 1281700 | 1.31% |
| 3 | Md Nasir Uddin Akond | 1202090076130551 | H1068 | NCCB Securities and Financial Services Limited | 1554282 | 1.58% | 1554282 | 1.58% | 1554282 | 1.58% | 1554282 | 1.58% |
| 4 | Md Nasir Uddin Akond | 1205590076098283 | 12014 | UCB Stock Brokerage Limited | 642000 | 0.65% | 642000 | 0.65% | 642000 | 0.65% | 642000 | 0.65% |
| Total | | | | | 9846424 | 10.04% | 9846424 | 10.04% | 9846424 | 10.04% | 9846424 | 10.04% |
| Total No. of Outstanding Securities | | | | | 98,079,877.00 | 10.04% | | 10.04% | | 10.04% | | 10.04% |

From the above table, it is observed that *Md. Nasir Uddin Akond* 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 বক্তি 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 প্রস্তাব করে.....”

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

“এক্সচেঞ্জ হইতে নগদ অর্থের বিনিময়ে উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন বা অধিগ্রহণ। (১) কোন কোম্পানিতে উল্লেখযোগ্য সংখ্যক এর কম কোন শেয়ারের ধারক বা ধারকগণ, বা যিনি বা যাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিবর্গ, এক্সচেঞ্জ হইতে উক্ত কোম্পানির কোন শেয়ার অর্জন বা অধিগ্রহণ করিতে চাহিলে অর্জন বা অধিগ্রহণ পরবর্তী ধারণকৃত মোট শেয়ারের পরিমাণ যদি ১০ (দশ) শতাংশ বা উহার অধিক পর্যায়ে উন্নীত হয় অথবা ১০(দশ) শতাংশ বা উহার অধিক কোন শেয়ার ধারক বা ধারকগণ এক্সচেঞ্জের মাধ্যমে উক্ত কোম্পানির আরও শেয়ার অর্জন বা অধিগ্রহণের ক্ষেত্রে তাহাকে তফসিল-১ বর্ণিত পদ্ধতিতে একটি ঘোষণা কোম্পানিটি যে এক্সচেঞ্জে তালিকাভুক্ত সেই এক্সচেঞ্জে সংশ্লিষ্ট অধিগ্রহণকারীর স্টক ব্রোকার বা মার্চেন্ট ব্যাংকারের মাধ্যমে দাখিল করিতে হইবে।”

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

Contravention(s):

Md. Nasir Uddin Akond (BOID # 1203710076132286) has violated 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/৩৪৭৭/২০২৩/১৪৪ স্মারকমূলে Mr. Md. Nasir Uddin Akond-কে ফেব্রুয়ারি ২৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে নির্ধারিত তারিখে শুনানীতে Mr. Md. Nasir Uddin Akond 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/3477/2023/144, 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. 1203710076132286, 1201820076102324, 1202090076130551 and 1205590076098283 maintaining with AB Securities Limited, Brac EPL Stock Brokerage Limited, NCCB Securities and Financial Services Limited and UCB Stock Brokerage 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. Nasir Uddin Akond-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. Nasir Uddin Akond-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Md. Nasir Uddin Akond-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;

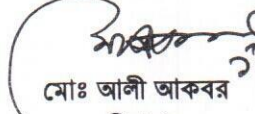
যেহেতু, Mr. Md. Nasir Uddin Akond-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Md. Nasir Uddin Akond-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. Nasir Uddin Akond-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ১.০০ (এক) 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। এবং
- বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) ভঙ্গের দায়ে সতর্ক করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Mr. Md. Nasir Uddin Akond

(BOID # 1203710076132286, 1201820076102324,
1202090076130551, 1205590076098283)

House: Ahond Bari, Vill: Kandapasha

PS: Gouronadi, Dist: Barishal