

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

বিএসইসি/এনফোর্সমেন্ট/৩২৯০/২০২২/১০৩৭
তারিখঃ আগস্ট ০২, ২০২২

Mr. Abul Kalam Matbar and his associates
Vill: Dinara 54, PO: Dinarahut
Naria, Shariatpur-8020.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩২৯০/২০২২/১০৩৬ তারিখ: আগস্ট ০২, ২০২২ এর সত্যায়িত অনুলিপি আপনার
অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

Abul Kalam Matbar
02/08/2022

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
টেলিফোন নাম্বার: +৮৮ ০২-৫৫০০৭১৩১-২, এক্স-১৩০৬
ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

- ১। নির্বাহী পরিচালক, এমএসআই, বিএসইসি,
- ২। নির্বাহী পরিচালক, এমআইএস, বিএসইসি,
- ৩। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।

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02/08/2022
(MIS)
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বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

নং-বিএসইসি/এনফোর্সমেন্ট/৩২৯০/২০২২/১০৩৬

তারিখঃ আগস্ট ০২ 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, নভেম্বর ৩০, ২০২১ তারিখের Surveillance Note-070/2021 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 ১৫.১১.২০২১ থেকে ৩০.১১.২০২১ পর্যন্ত সময়ের জন্য One Bank Limited (ONEBANKLTD)-এর শেয়ার লেনদেন সংক্রান্ত অনুসন্ধান (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

I. Major buyers of the period (Both Public and Block Market):

The price of the shares of 'ONEBANKLTD' was increased from Tk. 12.60 to Tk. 20.10, which increased 59.52% from 15.11.2021 to 30.11.2021. The Major buyers of the period were as follows:

Sl. No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	3898	Kazi Sadia Hasan	1205590068284973	UCB Stock Brokerage Limited	39829936	23356110	63186046	463203344	13.64
2	ABM645	Md. Abul Khayer	1605110071091116	Agrani Equity & Investment Limited	39616057	16273721	55889778	463203344	12.07
3	9166	Abul Kalam Matber	1205590073447222	UCB Stock Brokerage Limited	29840451	16160664	46001115	463203344	9.93
4	S11334	GENEX INFOSIS LTD.	1605530074472175	Southeast Bank Capital Services Ltd	10490000	1340000	11830000	463203344	2.55
5	ABM663	Abul Kalam Matber	1605110073447222	Agrani Equity & Investment Limited	10000000	9322787	19322787	463203344	4.17
6	D8762	M. Abu Naser Dulal	1201830007364204	LANKABANGLA Securities Ltd.	8500000	0	8500000	463203344	1.84
7	S11321	Candlestone Investments Partner Limited Managed Ac	1605530074250439	Southeast Bank Capital Services Ltd	7600000	0	7600000	463203344	1.64
8	T8507	SHAKIB AL HASAN	1605540074140719	Trust Bank Investment Limited	7501676	1020000	8521676	463203344	1.84
9	S11322	Candlestone Investments Partner Limited Managed Ac	1605530074255415	Southeast Bank Capital Services Ltd	7500000	0	7500000	463203344	1.62
10	9227	Md. Khorshed Alam	1201630062072548	Dhaka Bank Securities Limited	6900000	0	6900000	463203344	1.49
11	1690	Fortune Shoes Limited	1205950073681925	NRBC Bank Securities Limited	5886259	0	5886259	463203344	1.27
12	7647	Md. Abul Khayer	1205590071091116	UCB Stock Brokerage Limited	5647918	4540991	10188909	463203344	2.20
13	V00340	Md. Khorshed Alam	1206080062072548	Vertex Stock and Securities Limited	5345000	0	5345000	463203344	1.15
14	45120	Sonali Paper & Board Mills Ltd	1201950073583227	EBL Securities Limited	4798576	0	4798576	463203344	1.04
15	FC2057	Md. Sanowar Khan	1604630069527917	FAS Capital Management Limited	4300000	2900000	7200000	463203344	1.55

Findings:

➤ After analyzing documents, it is observed that **Ms. Kazi Sadia Hasan** (Client Code # 3898 of UCB Stock Brokerage Limited) was the **top buyer** of the shares of "ONEBANKLTD" from 15.11.2021 to 30.11.2021. Her husband **Mr. Md. Abul Khayer** (Client code # ABM645 of Agrani Equity & Investment Limited, the **2nd top buyer** and Client code # 7647 of UCB Stock Brokerage Limited, the **12th top buyer** and Client code # 1689 of NRBC Bank Securities Limited) participated in trading of shares of "ONEBANKLTD" in association with the following account holders from 15.11.2021 to 30.11.2021:

- His father and **3rd & 5th top buyer** named **Mr. Abul Kalam Matber** (client code # 9166 of UCB Stock Brokerage Ltd and ABM663 of Agrani Equity & Investment Ltd);
- Sister of Mr. Md. Abul Khayer, named **Konika Afroze** (client code # 7677 of UCB Stock Brokerage Limited and 03900 of NBL Securities Limited);

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II. Major sellers of the period (Both Public and Block Market):

The list of major sellers of shares of 'ONEBANKLTD' from 15.11.2021 to 30.11.2021 are as follows:

Sl. No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume In the market	% of total Trade
1	3898	Kazi Sadia Hasan	1205590068284973	UCB Stock Brokerage Limited	39829936	23356110	63186046	463203344	13.64
2	ABM645	Md. Abul Khayer	1605110071091116	Agrani Equity & Investment Limited	39616057	16273721	55889778	463203344	12.07
3	9166	Abul Kalam Matber	1205590073447222	UCB Stock Brokerage Limited	29840451	16160664	46001115	463203344	9.93
4	UF	Icb Unit Fund	1201530000003518	ICB Securities Trading Comapny Limited	200	12759990	12760190	463203344	2.75
5	ICB	Icb	1201530000003501	ICB Securities Trading Comapny Limited	0	9910790	9910790	463203344	2.14
6	ABM663	Abul Kalam Matber	1605110073447222	Agrani Equity & Investment Limited	10000000	9322787	19322787	463203344	4.17
7	32845	Eastern Bank Ltd	1201950030178336	EBL Securities Limited	0	9181957	9181957	463203344	1.98
8	AMCUF	Icb Amcl Unit Fund	1604580000002341	Investment Corporation Of Bangladesh	0	8090634	8090634	463203344	1.75
9	BDF	Bangladesh Fund	1605420043478871	ICB Capital Management Limited Head Office	0	7061150	7061150	463203344	1.52
10	7647	Md. Abul Khayer	1205590071091116	UCB Stock Brokerage Limited	5647918	4540991	10188909	463203344	2.20
11	MF007	Vanguard Aml Rupali Bank Bf	1604580051623248	Investment Corporation Of Bangladesh	0	4386062	4386062	463203344	0.95
12	41999	Nur-E- Alam	1201950062070101	EBL Securities Limited	3575123	4044740	7619863	463203344	1.65
13	CM286	MD. ATIQUR RAHMAN	1605170065122350	City Bank Capital Resources Limited	3500000	3500000	7000000	463203344	1.51
14	22364	Engr. Md. Atiqur Rahman	1203110030591052	United Financial Trading Company Limited	0	3396975	3396975	463203344	0.73
15	8936	Ashrafur Rahman	1204500043507721	City Brokerage Limited	0	3165000	3165000	463203344	0.68

Findings:

- After analyzing documents, it is observed that **Ms. Kazi Sadia Hasan** (Client code # 3898 of UCB Stock Brokerage Limited) was the top seller of shares of "ONEBANKLTD" from 15.11.2021 to 30.11.2021. The said client bought 39,829,936 and sold 23,356,110 shares of "ONEBANKLTD" during the aforementioned investigation period, which is 13.64% of total traded share of "ONEBANKLTD" during the period.

It is mentionable here that **Ms. Kazi Sadia Hasan** is the wife of **Mr. Abul Khayer** who participated in trading of shares of "ONEBANKLTD" in association with 13(Thirteen) more account holders (i.e. father, brother, sister and wife etc.) related to him and collectively traded significant portion of trades (47.07%) of the same company during the aforesaid investigation period.

A. Trading of Mr. Abul Kalam Matber and his associates:

Observation(s)-I:

Mr. Md. Abul Khayer (client code # ABM645 & BOID # 1605110071091116 of Agrani Equity & Investment Limited) was the 2nd top buyer of the shares of "ONEBANKLTD" from 15.11.2021 to 30.11.2021. After examining the relevant documents, it was also observed that the said client participated in trading of shares of "ONEBANKLTD" in association with 13(Thirteen) account holders more in the name of his family members and institutions and the details of the same is delineated as follows:

Sl. No.	Client Name	Client Code	BO ID	Name of TREC Holder	Remarks
1	MD. ABUL KHAYER	ABM645	1605110071091116	Agrani Equity & Investment Limited	Son of Abul Kalam Matber
2	MD. ABUL KHAYER	7647	1205590071091116	UCB Stock Brokerage Limited	
3	MD. ABUL KHAYER	1689	1205950071091116	NRBC Bank Securities Limited	
4	ABUL KALAM MATBER	9166	1205590073447222	UCB Stock Brokerage Limited	Abul Kalam Matber himself
5	ABUL KALAM MATBER	ABM663	1605110073447222	Agrani Equity & Investment Limited	
6	KAZI SADIA HASAN	3898	1205590068284973	UCB Stock Brokerage Limited	The wife of Mr. Md. Abul Khayer
7	KONIKA AFROZE	7677	1205590072553290	UCB Stock Brokerage Limited	Sister of Mr. Md. Abul Khayer
8	KONIKA AFROZE	03900	1203980072553290	NBL Securities Limited	



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“মুজিববর্ষের অঙ্গীকার
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

Individual Trade Patterns, Trade monitoring screenshots, Effects of “ONEBANKLTD” at DSE in public market by the said clients and gain and loss statement are given below:

a) Individual Trade Patterns of Mr. Abul Kalam Matber and his associates (Only Public Market):

Date	Code # ABM645				Code # 7647				Code # 1689				Code # 9166				Code # ABM663				Code # 3898			
	BO ID # 1605110071091116				BO ID # 1205590071091116				BO ID # 1205950071091116				BO ID # 1205590073447222				BO ID # 1605110073447222				BO ID # 1205590068284973			
	MD. ABUL KHAYER				MD. ABUL KHAYER				MD. ABUL KHAYER				ABUL KALAM MATBER				ABUL KALAM MATBER				KAZI SADIA HASAN			
	Agrani Equity & Investment Limited				UCB Stock Brokerage Limited				NRBC Bank Securities Limited				UCB Stock Brokerage Limited				Agrani Equity & Investment Limited				UCB Stock Brokerage Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	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	0	0.00
18-11-2021	0	0.00	0	0.00	5647918	14.64	0	0.00	0	0.00	0	0.00	16281001	13.49	0	0.00	0	0.00	0	0.00	377631	14.70	0	0.00
21-11-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10000000	16.10	0	0.00	9900000	16.10	0	0.00
22-11-2021	6200000	17.51	0	0.00	0	0.00	2110989	17.13	3700000	17.03	0	0.00	9879450	17.54	7660664	17.09	0	0.00	0	0.00	15252305	17.13	377000	17.80
23-11-2021	5000000	18.62	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2700000	18.15	0	0.00	0	0.00	0	0.00	923442	18.78	4300000	17.96
24-11-2021	6180718	19.77	4400000	19.47	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8399345	19.50	0	0.00
25-11-2021	2100000	18.87	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
28-11-2021	4389500	19.47	739720	18.86	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
30-11-2021	15745839	20.16	11134001	20.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	39616057		16273721		5647918		2110989		3700000		0		28860451		7660664		10000000		9322787		39829936		22076110	

Date	Code # 7677				Code # 03900			
	BO ID # 1205590072553290				BO ID # 1203980072553290			
	KONIKA AFROZE				KONIKA AFROZE			
	UCB Stock Brokerage Limited				NBL Securities Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00
18-11-2021	0	0.00	0	0.00	0	0.00	0	0.00
21-11-2021	4000000	16.10	0	0.00	0	0.00	0	0.00
22-11-2021	0	0.00	0	0.00	0	0.00	0	0.00
23-11-2021	0	0.00	0	0.00	2068282	18.50	0	0.00
24-11-2021	0	0.00	0	0.00	0	0.00	0	0.00
25-11-2021	0	0.00	0	0.00	0	0.00	0	0.00
28-11-2021	0	0.00	700000	19.00	0	0.00	1104282	18.92
30-11-2021	0	0.00	0	0.00	0	0.00	0	0.00
Total	4000000		700000		2068282		1104282	

b) Effects of “ONEBANKLTD” at DSE (both Public Market and Block Market) by Mr. Abul Kalam Matber and his associates:

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										0	0.00	0.00						
18-11-2021	22306550	13.81	307965432.80	0	0.00	0.00		0.00	0.00	22306550	13.81	307965432.80	31732649	14.70	9.70%	70.30%	0.00%	70.30%
21-11-2021	23939366	16.10	385423792.60	0	0.00	0.00		0.00	0.00	46245916	14.99	693389225.40	54264498	16.10	9.52%	44.12%	0.00%	44.12%
22-11-2021	35031755	17.30	606035973.60	21078655	17.11	360567116.80		15.99	336994590.65	60199016	15.99	962430608.35	93707334	17.20	6.83%	37.38%	22.49%	59.88%
23-11-2021	15040262	18.22	275627766.30	4814559	18.60	89545435.70		16.45	79214872.14	70432739	16.45	1158843502.50	57958008	18.70	8.72%	25.96%	8.31%	34.27%
24-11-2021	6180718	19.77	122183627.80	12799345	19.49	249481883.40		16.72	214013423.19	63814112	16.72	1067013707.11	56334800	18.50	-1.07%	10.97%	22.72%	33.69%
25-11-2021	9100000	19.05	173329358.90	0	0.00	0.00		0.00	0.00	72914112	17.01	1240343066.01	31931168	18.90	2.16%	28.50%	0.00%	28.50%
28-11-2021	4389500	19.47	85477262.00	4061602	19.06	77397782.10		17.15	69659804.46	73242010	17.15	1256160523.55	31422929	18.90	0.00%	13.97%	12.93%	26.89%
30-11-2021	27131515	20.26	549793933.10	32140994	20.06	644746559.10		17.99	578291649.67	68232531	17.99	1227662806.98	96420000	20.10	6.35%	28.14%	33.33%	61.47%
Total	143127686	17.51	2505837147.10	74855255	18.98	1421728777.10	0	17.07	1278174340.12	68232531	17.99	1227662806.98						

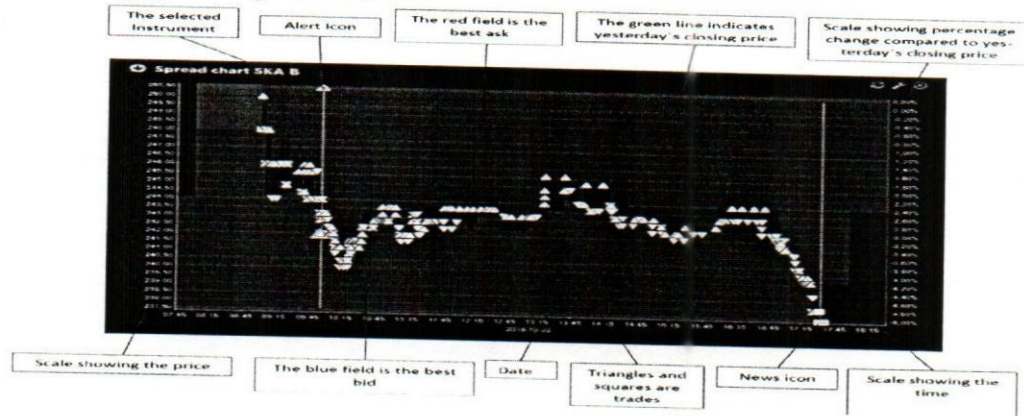
বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
980000	18.40	18032000.00	14626602	17.54	256579254.20	143127686	17.51	2505837147.10	74895155	18.98	1421738777.10	17.07	1278174340.12	68232531	17.99	1227662806.98

c) **Trade monitoring screenshots of Mr. Abul Kalam Matber and his associates (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 Mr. Abul Kalam Matber and his associates were observed which influenced to uplift the price of shares of 'ONEBANKLTD' during the investigation period.

The details of the graphs are given below:

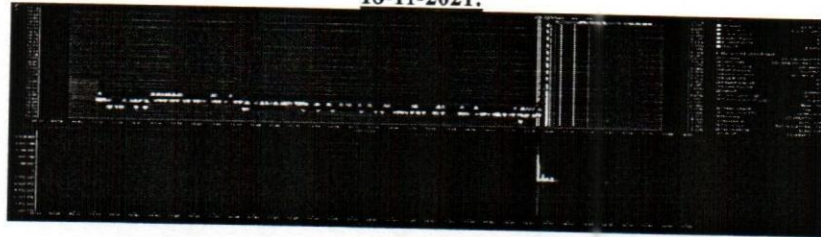


▲ Green triangle represents trade of 'ONEBANKLTD' by Mr. Abul Kalam Matber and his associates

△ White triangle represents trade of shares of 'ONEBANKLTD' by other clients

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department of DSE, it is found that Mr. Abul Kalam Matber and his associates were involved in trading of shares of 'ONEBANKLTD' which influenced to uplift the price of the said securities on several dates:

18-11-2021:



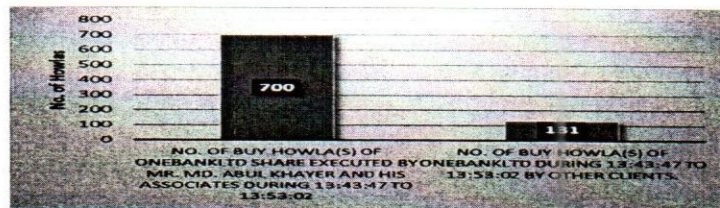
It was observed in the above graph that on 18-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 1,672, whereas number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 746 which is approximately 44.6% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 31,522,546 whereas, buy volume by the said clients was 22,306,550 which is approximately 70.8% of the total volume in the market. It is evident that the client had significant participation in the market on 18-11-2021 in trading of shares of 'ONEBANKLTD'.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

On 18-11-2021, trading of ONEBANKLTD share was started at Tk. 13.40 which is Tk. 0.00 which is similar as the the YCP of Tk. 13.40. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 13:43:47 at price Tk. 13.40 and induced the same to rise to Tk. 14.70 up to 13:53:02. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 13:43:47 to 13:53:02, Mr. Abul Kalam Matber and his associates bought 21,928,919 shares of ONEBANKLTD compared to the total traded share of 26,168,907. This is shown in the following Pie Chart:

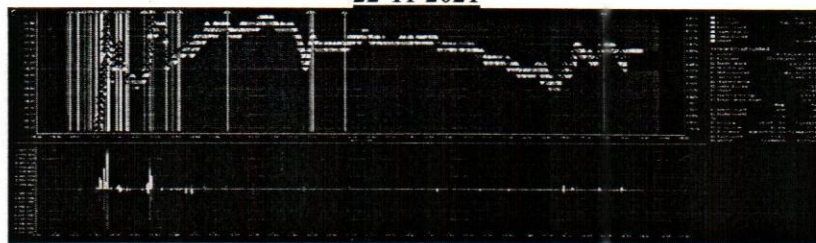


It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 700 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 831 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 83.80% of the total trades of ONEBANKLTD shares by executing 700 of total 831 howlas from 13:43:47 to 13:53:02 on 18-11-2021. From 13:43:47 to 13:53:02, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 13.40 to Tk. 14.70. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 1.30 which is approximately 9.70% higher than YCP.

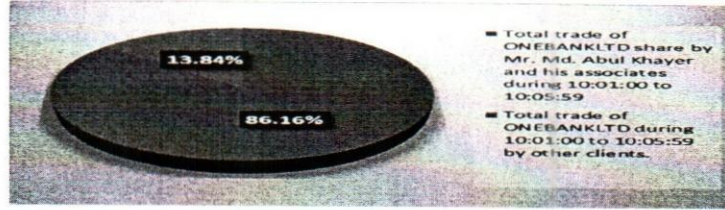
22-11-2021



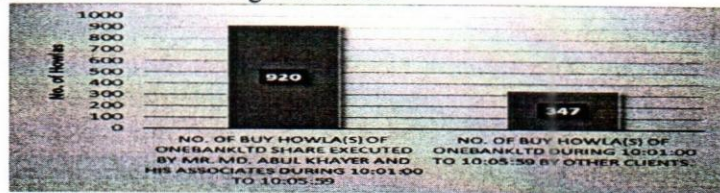
It was observed in the graph dated 22-11-2021 that, total number of trades of shares of 'ONEBANKLTD' in the market was 7,565 whereas, number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 1,910 which is approximately 25.2% of the total number of trades in the market. Again, total volume of 'ONEBANKLTD' in the market on that day was 82,677,332 whereas, buy volume by the said clients was 35,031,755 which is approximately 42.4% of the total volume in the market. It is evident that the client had significant participation in the market on 22-11-2021 in trading of shares of 'ONEBANKLTD'.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

On 22-11-2021, trading of ONEBANKLTD share was started at Tk. 16.10 which is Tk. 0.00 which is similar as the the YCP of Tk. 16.10. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:01:00 at price Tk. 16.00 and induced the same to rise to Tk. 17.70 up to 10:05:59. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:01:00 to 10:05:59, Mr. Abul Kalam Matber and his associates bought 19,990,695 shares of ONEBANKLTD compared to the total traded share of 23,201,896. This is shown in the following Pie Chart

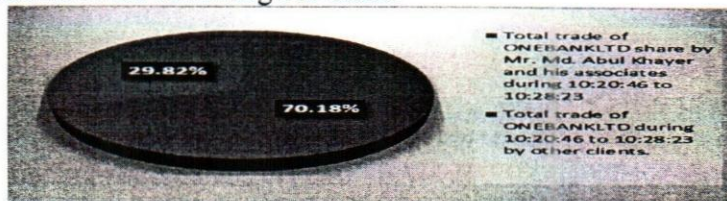


It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 920 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 1,267 as shown in the following Bar Chart:



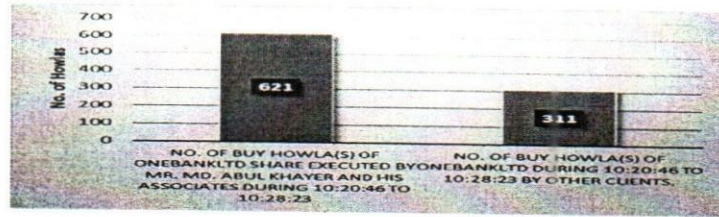
It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 86.16% of the total trades of ONEBANKLTD shares by executing 920 of total 1,267 howlas from 10:01:00 to 10:05:59 on 22-11-2021. From 10:01:00 to 10:05:59, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 16.00 to Tk. 17.70. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 1.10 which is approximately 6.83% higher than YCP.

Again, on 22-11-2021, Mr. Abul Kalam Matber and his associates started series of trading at 10:20:46 at price Tk. 16.60 and induced the same to rise to Tk. 17.70 up to 10:28:23. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:20:46 to 10:28:23, Mr. Abul Kalam Matber and his associates bought 9,799,968 shares of ONEBANKLTD compared to the total traded share of 13,963,638. This is shown in the following Pie Chart:



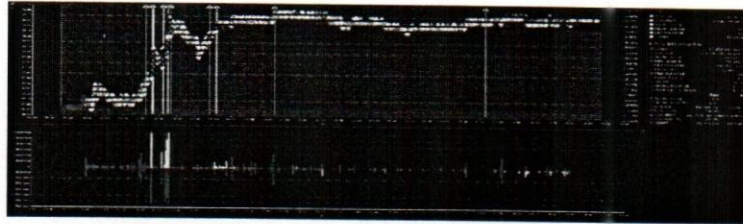
It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 621 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 932 as shown in the following Bar Chart:

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন



It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 70.18% of the total trades of ONEBANKLTD shares by executing 621 of total 932 howlas from 10:20:46 to 10:28:23 on 22-11-2021. From 10:20:46 to 10:28:23, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 16.60 to Tk. 17.70. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 1.10 which is approximately 6.83% higher than YCP.

23-11-2021



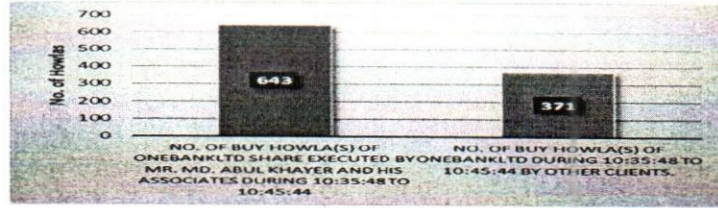
It was observed in the above graph that on 23-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 5,547 whereas, number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 825 which is approximately 14.9% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 56,583,008 whereas, buy volume by the said clients was 14,068,282 which is approximately 24.9% of the total volume in the market. It is evident that the client had significant participation in the market on 23-11-2021 in trading of shares of 'ONEBANKLTD'.

On 23-11-2021, trading of ONEBANKLTD share was started at Tk. 17.00 which is Tk. -0.20 less than the YCP of Tk. 17.20. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:35:48 at price Tk. 17.60 and induced the same to rise to Tk. 18.70 up to 10:45:44. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:35:48 to 10:45:44, Mr. Abul Kalam Matber and his associates bought 11,700,000 shares of ONEBANKLTD compared to the total traded share of 15,147,605. This is shown in the following Pie Chart:



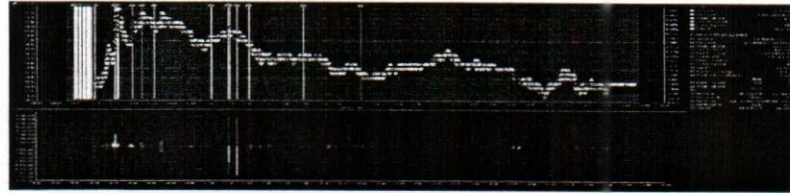
It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 643 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 1,014 as shown in the following Bar Chart:

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন



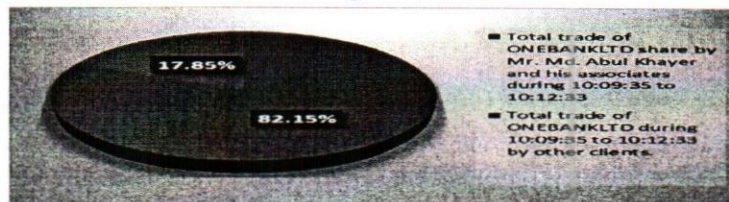
It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 77.24% of the total trades of ONEBANKLTD shares by executing 643 of total 1,014 howlas from 10:35:48 to 10:45:44 on 23-11-2021. From 10:35:48 to 10:45:44, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 17.60 to Tk. 18.70. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 1.50 which is approximately 8.72% higher than YCP.

24-11-2021



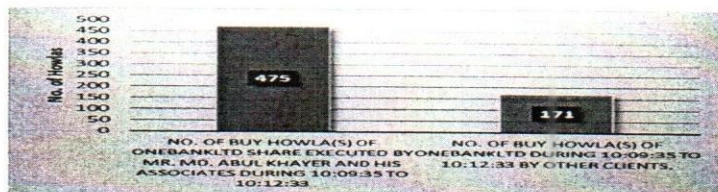
It was observed in the above graph that on 24-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 6,430, whereas, number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 552 which is approximately 8.6% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 56,304,800, whereas, buy volume by the said clients was 6,180,718 which is approximately 11.0% of the total volume in the market.

On 24-11-2021, trading of ONEBANKLTD share was started at Tk. 18.50 which is Tk. -0.20 less than the YCP of Tk. 18.70. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:09:35 at price Tk. 19.20 and induced the same to rise to Tk. 20.00 up to 10:12:33. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:09:35 to 10:12:33, Mr. Abul Kalam Matber and his associates bought 5,080,718 shares of ONEBANKLTD compared to the total traded share of 6,184,713. This is shown in the following Pie Chart.:



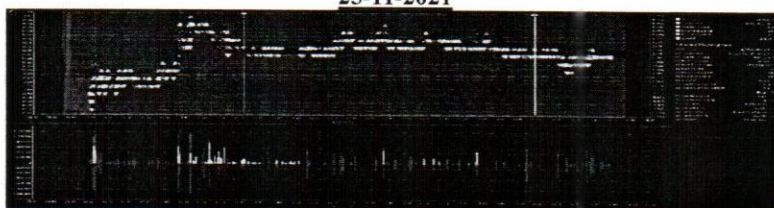
It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 475 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 646 as shown in the following Bar Chart:

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন



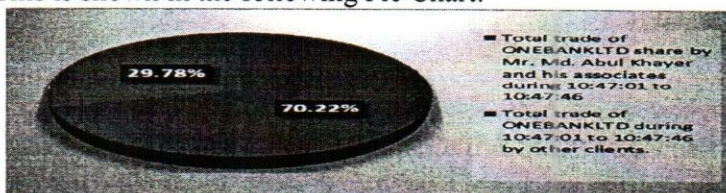
It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 82.15% of the total trades of ONEBANKLTD shares by executing 475 of total 646 howlas from 10:09:35 to 10:12:33 on 24-11-2021. From 10:09:35 to 10:12:33, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 19.20 to Tk. 20.00. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share.

25-11-2021

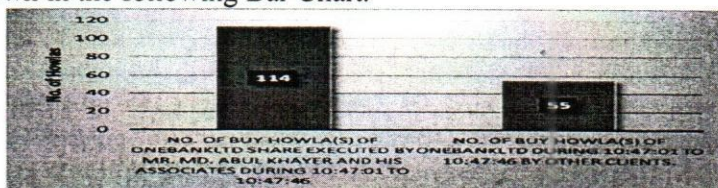


It was observed in the above graph that on 25-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 3,911, whereas, number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 847 which is approximately 21.7% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 31,806,173, whereas, buy volume by the said clients was 9,100,000 which is approximately 28.6% of the total volume in the market. It is evident that the client had significant participation in the market on 25-11-2021 in trading of shares of 'ONEBANKLTD'.

On 25-11-2021, trading of ONEBANKLTD share was started at Tk. 18.40 which is Tk. -0.10 less than the YCP of Tk. 18.50. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:47:01 at price Tk. 18.80 and induced the same to rise to Tk. 19.20 up to 10:47:46. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:47:01 to 10:47:46, Mr. Abul Kalam Matber and his associates bought 1,000,000 shares of ONEBANKLTD compared to the total traded share of 1,424,061. This is shown in the following Pie Chart:



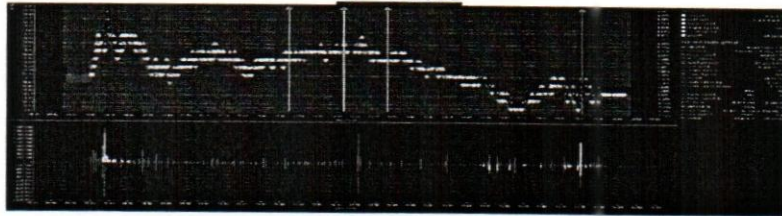
It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 114 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 169 as shown in the following Bar Chart:



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 70.22% of the total trades of ONEBANKLTD shares by executing 114 of total 169 howlas from 10:47:01 to 10:47:46 on 25-11-2021. From 10:47:01 to 10:47:46, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 18.80 to Tk. 19.20. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 0.40 which is approximately 2.16% higher than YCP.

28-11-2021

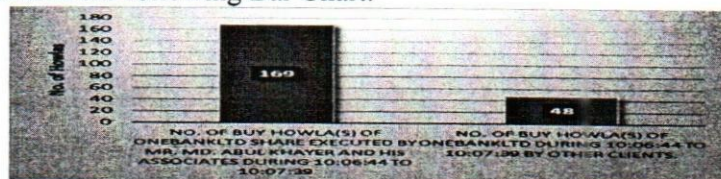


It was observed in the above graph that on 28-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 4,148, whereas number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 345 which is approximately 8.3% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 29,645,329, whereas, buy volume by the said clients was 4,389,500 which is approximately 14.8% of the total volume in the market.

On 28-11-2021, trading of ONEBANKLTD share was started at Tk. 19.10 which is Tk. 0.20 more than the YCP of Tk. 18.90. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:06:44 at price Tk. 19.50 and induced the same to rise to Tk. 19.90 up to 10:07:39. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:06:44 to 10:07:39, Mr. Abul Kalam Matber and his associates bought 2,000,000 shares of ONEBANKLTD compared to the total traded share of 2,468,400. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 169 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 217 as shown in the following Bar Chart:

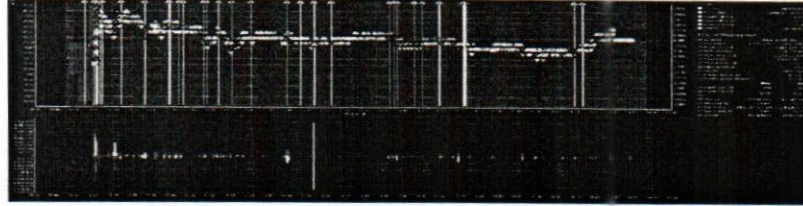


It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 81.02% of the total trades of ONEBANKLTD shares by executing 169 of total 217 howlas from 10:06:44 to 10:07:39 on 28-11-2021. From 10:06:44 to 10:07:39, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 19.50 to Tk. 19.90. Thus it seems that Mr. Abul

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 0.00 which is approximately 0.00% higher than YCP.

30-11-2021

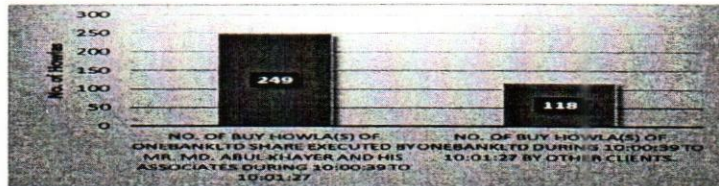


It was observed in the above graph that on 30-11-2021, total number of trades of shares of 'ONEBANKLTD' in the market was 6,039, whereas number of trades (buy) executed by Mr. Abul Kalam Matber and his associates were 598 which is approximately 9.9% of the total number of trades in the market. Again, total volume of shares of 'ONEBANKLTD' in the market on that day was 94,006,000, whereas, buy volume by the said clients was 27,131,515 which is approximately 28.9% of the total volume in the market. It is evident that the client had significant participation in the market on 30-11-2021 in trading of shares of 'ONEBANKLTD'.

On 30-11-2021, trading of ONEBANKLTD share was started at Tk. 19.60 which is Tk. 0.70 more than the YCP of Tk. 18.90. On that day, Mr. Abul Kalam Matber and his associates started series of trading at 10:00:39 at price Tk. 19.70 and induced the same to rise to Tk. 20.70 up to 10:01:27. It can also be observed from the above graph that Mr. Abul Kalam Matber and his associates executed significant trades during this time period. It is mentionable here that from 10:00:39 to 10:01:27, Mr. Abul Kalam Matber and his associates bought 9,000,000 shares of ONEBANKLTD compared to the total traded share of 10,986,045. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Abul Kalam Matber and his associates executed 249 howlas to purchase of shares of ONEBANKLTD compared to the total number of howlas of 367 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Mr. Abul Kalam Matber and his associates bought 81.92% of the total trades of ONEBANKLTD shares by executing 249 of total 367 howlas from 10:00:39 to 10:01:27 on 30-11-2021. From 10:00:39 to 10:01:27, Mr. Abul Kalam Matber and his associates induced the price to rise from Tk. 19.70 to Tk. 20.70. Thus it seems that Mr. Abul Kalam Matber and his associates were actively trying to lift the price of ONEBANKLTD share. At the end of the day price of ONEBANKLTD share was increased by Tk. 1.20 which is approximately 6.35% higher than YCP.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

d. Gain and Loss by Mr. Abul Kalam Matber and his associates from 15.11.2021 to 30.11.2021:

Realized Capital gain (loss) per unit	1.92	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	11.23%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	14,35,64,436.98	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (30-11-2021)	20.10	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	2.11	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	11.71%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	14,38,11,066.12	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that Mr. Abul Kalam Matber and his associates bought 143,127,686 shares and sold 74,895,155 shares of "ONEBANKLTD" from both public and block market during the period from 15.11.2021 to 30.11.2021. With their 14 (Fourteen) BO accounts, Mr. Abul Kalam Matber and his associates jointly traded 47.07% shares of "ONEBANKLTD" during the investigation period and realized a capital gain of Tk. 143,564,436.98 from the trading of shares of "ONEBANKLTD" during the investigation period. It is also mentionable that they had significant amount of unrealized gain of Tk. 143,811,066.12.

Finding(s)-1:

As per section 17 of the Securities and Exchange Ordinance, 1969, "No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(v) directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is evident that Mr. Abul Kalam Matber and his associates were involved directly and indirectly in a series of transactions of shares of 'ONEBANKLTD' with their aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

Contravention(s)-1:

It appears that Mr. Md. Abul Khayer and his associates have 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 "ONEBANKLTD" creating the appearance of active trading therein and raising price of the said share.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

“মুজিববর্ষের অঙ্গীকার
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

Observations – 2(a):

As per DSE trade data, it was observed that **Md. Abul Khayer** (Client code # 1689 & BOID # 1205950071091116 of NRB Bank Securities Limited) bought total 1,075,384 shares of “ONEBANKLTD” from his father **Mr. Abul Kalam Matber** (Client code # 9166 & BOID # 1205590073447222 of UCB Stock Brokerage Limited) through 13(Thirteen) Howlas and the details of the mentioned trades are as follows:

Table: Counterparty trade between Mr. Md. Abul Khayer and Mr. Abul Kalam Matber:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOID SELLER	MARKET TYPE	Remarks
22/11/2021	10:26:13	225510391	ONEBANKLTD	75384	17.1	DSENRB	MD. ABUL KHAYER	1689	1205950071091116	DSEUBR	ABUL KALAM MATBER	9166	1205590073447222	Public	Mr. Abul Khalam Matber is the father of Mr. Abul Khayer
22/11/2021	10:26:34	225510671	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510672	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510673	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510674	ONEBANKLTD	90808	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510675	ONEBANKLTD	9192	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510676	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510677	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510678	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510679	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510680	ONEBANKLTD	90808	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510681	ONEBANKLTD	9192	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	
22/11/2021	10:26:34	225510682	ONEBANKLTD	100000	17.1	DSENRB		1689	1205950071091116	DSEUBR		9166	1205590073447222	Public	

(DSE Trade Data)

Findings-2(a):

As per section 17(e)(ii) of the Bangladesh Securities and Exchange Ordinance, 1969 (XVII of 1969), “No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(ii) create a false and misleading appearance of active trading in any security;”

Contravention-2(a):

Through the aforesaid activities, it appears that **Md. Abul Khayer** (Client code # 1689 & BOID # 1205950071091116 of NRB Bank Securities Limited) and **Mr. Abul Kalam Matber** (Client code # 9166 & BOID # 1205590073447222 of UCB Stock Brokerage Limited) has violated **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 1,075,384 shares of “ONEBANKLTD” on 22/11/2021 by 13(Thirteen) howlas creating a false and misleading appearance of active trading of shares of ‘ONEBANKLTD’.

Observations – 2(b):

It is observed that, **Md. Abul Khayer** (Client code # 1689 & BOID # 1205950071091116 of NRB Bank Securities Limited) bought **4,00,000** shares of ‘ONEBANKLTD’ from his another link account (Client code # 7647 & BOID # 1205590071091116 maintained with UCB Stock Brokerage Limited) on 22/11/2021 by 8(Eight) howlas which involved no change in beneficial ownership. The details of all the trades are delineated below:



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

“মুজিববর্ষের অঙ্গীকার
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

Table: Counterparty trading of Md. Abul Khayer (BOID # 1205950071091116) and Md. Abul Khayer (BOID # 1205590071091116):

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOID SELLER	MARKET TYPE	Remarks
22/11/2021	13:58:23	225634461	ONEBANKLTD	62532	17	DSENRB	MD. ABUL KHAYER	1689	1205950071091116	DSEUBR	MD. ABUL KHAYER	7647	1205590071091116	Public	Mr. Abul Khayer himself
22/11/2021	13:58:23	225634462	ONEBANKLTD	37468	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634486	ONEBANKLTD	58877	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634487	ONEBANKLTD	41123	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634490	ONEBANKLTD	38877	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634491	ONEBANKLTD	61123	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634494	ONEBANKLTD	18877	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	
22/11/2021	13:58:23	225634495	ONEBANKLTD	81123	17	DSENRB		1689	1205950071091116	DSEUBR		7647	1205590071091116	Public	

(DSE Trade Data)

Finding-2(b):

As per section 17(e)(iii) of the Bangladesh Securities and Exchange Ordinance, 1969 (XVII of 1969), “No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(iii) effect any transaction in such security which involves no change in its beneficial ownership;”

Contravention-2(b):

Through the aforesaid activities, it appears that **Md. Abul Khayer** (BOID # 1205950071091116 & 1205590071091116) has violated **Section 17(e)(iii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 4,00,000 shares of ‘ONEBANKLTD’ by 8(Eight) howlas which involved no change in beneficial ownership.

Observation – 2(c):

As per DSE trade data, it was found that **Md. Abul Khayer** (Client code # **ABM645 & BOID # 1605110071091116** of **Agrani Equity & Investment Limited**) bought 536,856 shares of “ONEBANKLTD” from his sister **Ms. Konika Afroze** (Client code # **7677 & BOID # 1205590072553290** of **UCB Stock Brokerage Limited**) through 25(Twenty-Five) Howlas and the details of all the above mentioned trades are as follows:

Table: Counterparty trading of Md. Abul Khayer and Ms. Konika Afroze:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOID SELLER	MARKET TYPE	Remarks
28/11/2021	14:20:29	226283555	ONEBANKLTD	500000	19	DSECBL	MD. ABUL KHAYER	ABM645	1605110071091116	DSEUBR	KONIKA AFROZE	7677	1205590072553290	Public	Mrs. Konika Afroze is the sister of Md. Abul Khayer
28/11/2021	14:27:12	226292110	ONEBANKLTD	2000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:27:22	226292428	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:27:40	226292890	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:27:47	226293110	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:27:53	226293269	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:27:59	226293491	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:06	226293715	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:11	226293819	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:20	226294162	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:24	226294257	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:29	226294389	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:34	226294554	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:40	226294730	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:46	226294923	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:51	226295101	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:54	226295232	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:28:57	226295325	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:00	226295418	ONEBANKLTD	2000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:04	226295628	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:09	226295830	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:13	226295991	ONEBANKLTD	1000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:17	226296166	ONEBANKLTD	5000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:17	226296312	ONEBANKLTD	5000	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	
28/11/2021	14:29:20	226296432	ONEBANKLTD	3856	19	DSECBL		ABM645	1605110071091116	DSEUBR		7677	1205590072553290	Public	

(DSE trade data)

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

“মুজিববর্ষের অঙ্গীকার
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

Findings-2(c):

As per section 17(e)(ii) of the Bangladesh Securities and Exchange Ordinance, 1969 (XVII of 1969), “No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(ii) create a false and misleading appearance of active trading in any security;”

Contravention(s)- 2(c):

Through the aforesaid activities, it appears that **Md. Abul Khayer (Client code # ABM645 & BOID # 1605110071091116 of Agrani Equity & Investment Limited)** and **Ms. Konika Afroze (Client code # 7677 & BOID # 1205590072553290 of UCB Stock Brokerage Limited)** have violated **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 536,856 shares of “ONEBANKLTD” on 28/11/2021 by 25(Twenty-Five) howlas creating a false and misleading appearance of active trading of shares of “ONEBANKLTD”.

Observation – 2(d):

As per DSE trade data, it was found that **Md. Abul Khayer (Client code # ABM645 & BOID # 1605110071091116 of Agrani Equity & Investment Limited)** bought 9,900,000 shares of “ONEBANKLTD” from his wife **Ms. Kazi Sadia Hasan (Client code # 3898 & BOID # 1205590068284973 of UCB Stock Brokerage Limited)** through 10(Ten) Howlas and the details of all the above mentioned trades are as follows:

Table: Counterparty trading of Md. Abul Khayer and Ms. Kazi Sadia Hasan:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOID SELLER	MARKET TYPE	Remarks
30/11/2021	11:53:37	226493284	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493287	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493290	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493292	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493294	ONEBANKLTD	1000000	20	DSECB	MD. ABUL KHAYER	ABM645	1605110071091116	DSEUBR	KAZI SADIA HASAN	3898	1205590068284973	Public	Ms. Kazi Sadia Hasan is the wife of Md. Abul Khayer
30/11/2021	11:53:37	226493295	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493296	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493297	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493298	ONEBANKLTD	1000000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	
30/11/2021	11:53:37	226493299	ONEBANKLTD	900000	20	DSECB		ABM645	1605110071091116	DSEUBR		3898	1205590068284973	Public	

(DSE trade data)

Findings-2(d):

As per section 17(e)(ii) of the Bangladesh Securities and Exchange Ordinance, 1969 (XVII of 1969), “No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(ii) create a false and misleading appearance of active trading in any security;”

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

Contravention(s)- 2(d):

Through the aforesaid activities, it appears that **Md. Abul Khayer** (Client code # **ABM645 & BOID # 1605110071091116** of **Agrani Equity & Investment Limited**) and **Ms. Kazi Sadia Hasan** (Client code # **3898 & BOID # 1205590068284973** of **UCB Stock Brokerage Limited**) have violated **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 9,900,000 shares of "ONEBANKLTD" on 30/11/2021 by 10(Ten) howlas creating a false and misleading appearance of active trading of shares of "ONEBANKLTD".

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্টে বিভাগ কর্তৃক মে ১৬, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩২৯০/২০২২/৭০৭ স্মারকমূলে Mr. Abul Kalam Matbar and his associates -কে জুন ০৫, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিতি হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mr. Abul Kalam Matbar and his associates -এর পক্ষে Mr. Md. Abul Khayer (on behalf) নিম্নলিখিত বক্তব্য দাখিল করেন;

"With due respect, I, hereby would like to take the opportunity to explain my position in respect of your letter no. BSEC/Enforcement/3290/2022/707 dated May 16, 2022 regarding ONEBANKLTD.

This has reference to the above-mentioned subject; we would like to give my sincere thanks and gratitude to the current management of BSEC for the initiatives that are pursued for the development of Bangladesh capital market that will ultimately help the industrialization of Bangladesh economy under the direct supervision of the daughter of Bangabandhu HH Prime Minister Sheikh Hasina M.P. We believe that Bangladesh economy will grow in the current pace to make it middle income and higher income country within shortest possible time under Her Leadership. To pace and sustain with this growth, capital market of Bangladesh will play significant role by providing long term capital to the industries. Based on this believe and understanding, we invested our whole hearted effort, money and time to the development of Bangladesh Capital Market. We analyzed, summarized and taken decision to invest in the mentioned share of ONEBANKLTD considering the development of Banking Sector. We have no other intention but to invest honestly in the mentioned shares like any other shares to get capital gain.

Please be noted that it gives huge losses in our portfolios although report mentioned in your letter shows significant realized and unrealized income.

We have given fresh buy and sale order to our traders to buy the shares in fresh without considering any bad or manipulative motive. Since we are maintaining a large number of portfolios in different houses, our simultaneous trading orders were passed to the traders for execution of trades. Thus, if any mistakes that may happened in our trades were purely unintentional or inadvertent mistakes which are evident in quantity of trades in comparison to total trades as per your report

I always try to comply rules and regulation at the time trade. In addition to this, my trade volume helps to provide sufficient liquidity in the market which ultimately increase the turnover of the exchanges.

I sincerely apologize for the inadvertent mistakes/ contravention that had happened through the abovementioned trades. It has happened due to my ignorance of the fact not intentional. I am assuring that I will be more careful for future transaction."

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

যেহেতু, Mr. Abul Kalam Matbar and his associates -এর উপরোক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক সেহেতু এক্ষেত্রে Mr. Abul Kalam Matbar and his associates -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Abul Kalam Matbar and his associates -এর উপরোক্ত কর্মকান্ডের ফলে Securities and Exchange Ordinance, 1969 এর Section 17 (e) (v), (ii) এবং (iii) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Mr. Abul Kalam Matbar and his associates -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 Mr. Abul Kalam Matbar and his associates -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] এ প্রদত্ত ক্ষমতাবলে-

- Mr. Abul Kalam Matbar and his associates -কে ৩ (তিন) কোটি টাকা জরিমানা 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:

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