

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮২/২০২২/১২৮৯

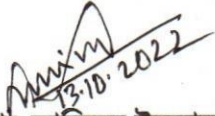
তারিখ: অক্টোবর ১৩, ২০২২

**Mr. Md. Jashim Uddin**  
Shokdi Rampur, Chandra  
Faridganj, Chandpur- 3651.

**বিষয়: আদেশ।**

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩২৮২/২০২২/১২৮৮ তারিখ: অক্টোবর ১৩, ২০২২ এর সত্যায়িত  
অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

  
13.10.2022

মোঃ আমিরুল ইসলাম

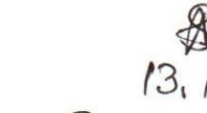
সহকারী পরিচালক (এনফোর্সমেন্ট)

টেলিফোন নাম্বার: ০১৬৮১০০৯৩৮৫

ই-মেইল: amirul@sec.gov.bd

**অবগতির জন্য অনুলিপি:**

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

  
13.10.22  
D(MIS)  
DD-I(MIS)

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮২/২০২২/৩২৮৮

তারিখঃ ১৩ অক্টোবর, 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, সেপ্টেম্বর ১৭, ২০২০ তারিখের Surveillance Note-034/2020 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 ২৬.০৭.২০২০ থেকে ১৪.০৯.২০২০ পর্যন্ত সময়ের জন্য Eastern Insurance Company Limited (EASTERNINS) -এর শেয়ার লেনদেন সংক্রান্ত ইনভেস্টিগেশন কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। ইনভেস্টিগেশন প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:






A. Mr. Md. Jashim Uddin:

Observation :

Trade monitoring screenshots of Md. Jashim Uddin:

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of Mr. Md. Jashim Uddin was observed to influence the price of EASTERNINS.

The details of the graphs are given below:

-  Light blue area indicates bid price
-  Pink area indicates ask price
-  Black area indicates spread between ask and bid prices
-  Green cube represents trade of EASTERNINS by Md. Jashim Uddin
-  White cube represents trade of EASTERNINS by other clients

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it was found that Mr. Md. Jashim Uddin traded significant amount of EASTERNINS share during the investigation period. These are shown below:



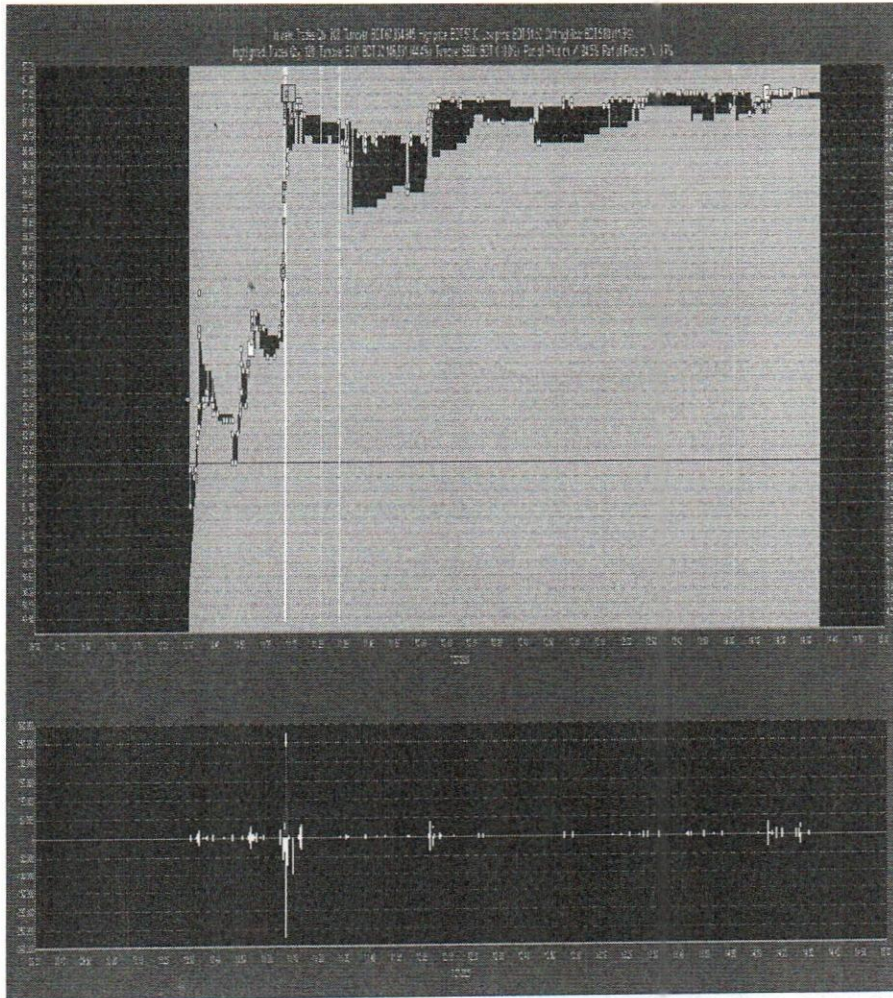


বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

"মুজিববর্ষের অঙ্গীকার  
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার"

BO ID # 1204480063663699, 1205150063663699, 1205150063663712, 1604530063663699, 1604530065499362,  
1204480063663712, 1205150065499362, 1604530063663712,  
1205150066057561

27.07.2020



*Handwritten signature*

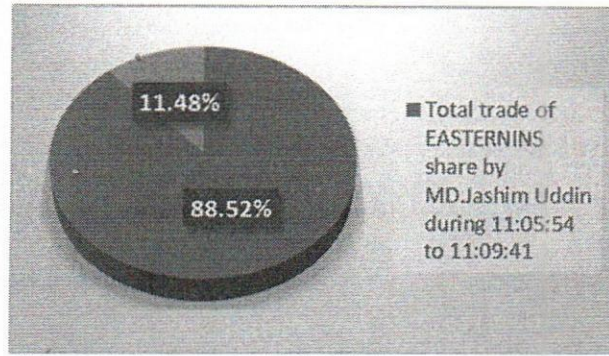
সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭

Phone (PABX) : +88-02-55007131-2 Fax : +88-02-55007106 E-mail : info@sec.gov.bd Web : www.sec.gov.bd

## বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

It is observed in the above graph that on 27.07.2020, total number of trades of EASTERNINS in the market was 708, whereas number of trades executed by Md. Jashim Uddin was 126 which is approximately 17.796% of the total number of trades in the market. Again, total turnover of EASTERNINS in the market on that day was BDT 67,854,945 whereas buy turnover by the said clients was BDT 30,145,316 which is approximately 44.43% of the total turnover in the market. It is evident that the client had major participation in the market on 27.07.2020 in trading of EASTERNINS share.

On 27.07.2020, Mr. Md. Jashim Uddin started series of trading at 11:05:54 at price Tk. 54.00 and induced the same to rise to Tk. 57.00 at 11:09:41. It can be observed from the above graph that Mr. Md. Jashim Uddin executed significant trades during this time period. From 11:05:54 to 11:09:41, Mr. Md. Jashim Uddin bought 4,96,002 shares of EASTERNINS compared to the total traded share of 560,312 as shown in the following Pie Chart.

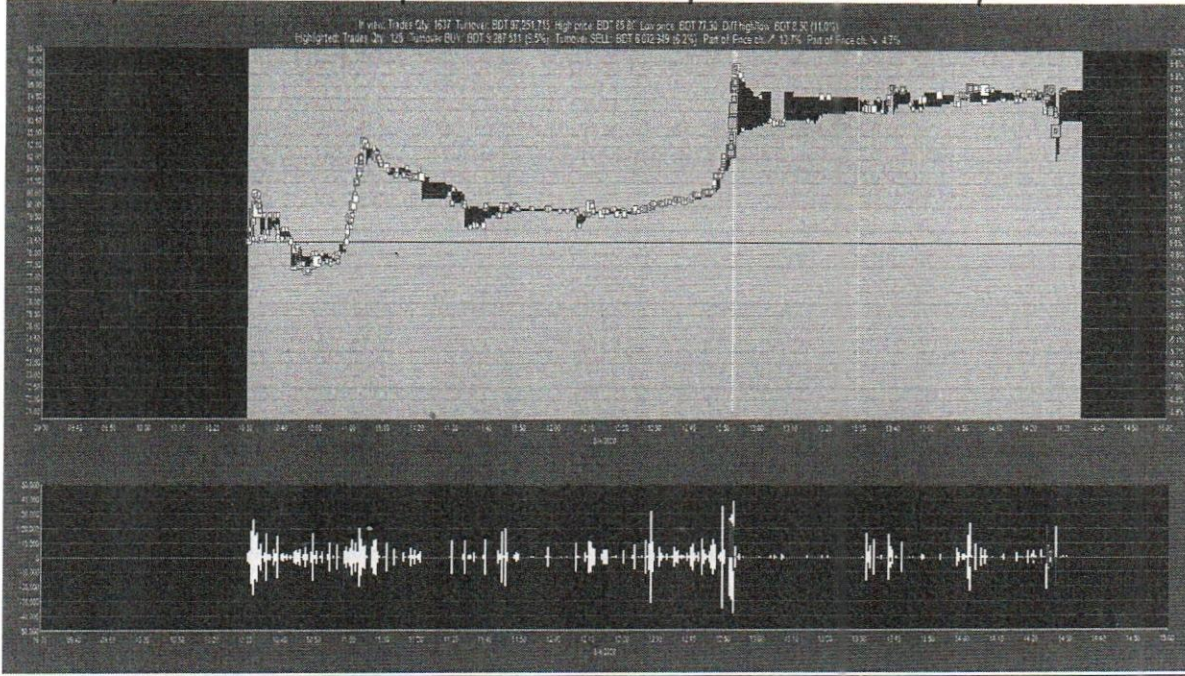


Thus it seems that Mr. Md. Jashim Uddin was actively trying to lift the price higher than YCP of Tk. 52.10 At the end of the day price of EASTERNINS share was increased by Tk. 4.90 from YCP to closing price at 57.30.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

BO ID # 1204480063663699, 1205150063663699, 1205150063663712, 1604530063663699, 1604530065499362,  
1204480063663712, 1205150065499362, 1604530063663712,  
1205150066057561

04.08.2020

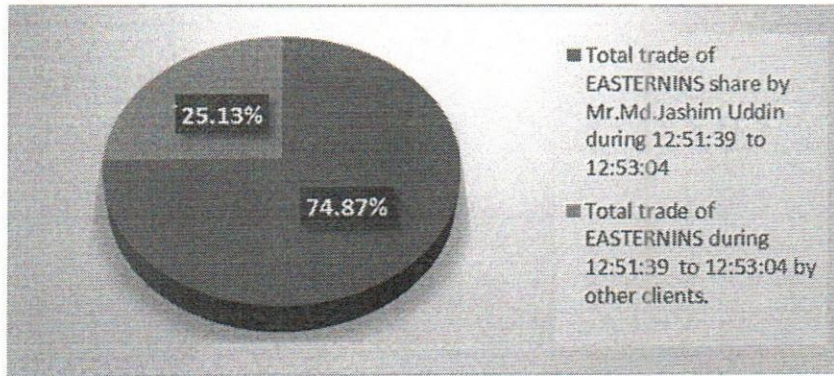


Handwritten signature

## বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

It is observed in the above graph that on 04.08.2020, total number of trades of EASTERNINS in the market was 1637, whereas number of trades executed by Md. Jashim Uddin was 124 which is approximately 7.57% of the total number of trades in the market. Again, total turnover of EASTERNINS in the market on that day was BDT 97,251,715 whereas buy turnover by the said clients was BDT 9,287,511 which is approximately 9.5% of the total turnover in the market. It is evident that the client had participation in the market on 04.08.2020 in trading of EASTERNINS share.

On 04.08.2020, Mr. Md. Jashim Uddin started series of trading at 12:51:39 at price Tk. 82.20 and induced the same to rise to Tk. 85.80 at 12:53:04. It can be observed from the above graph that Mr. Md. Jashim Uddin executed significant trades during this time period. From 12:51:39 to 12:53:04, Mr. Md. Jashim Uddin bought 70000 shares of EASTERNINS compared to the total traded share of 93500 as shown in the following Pie Chart.

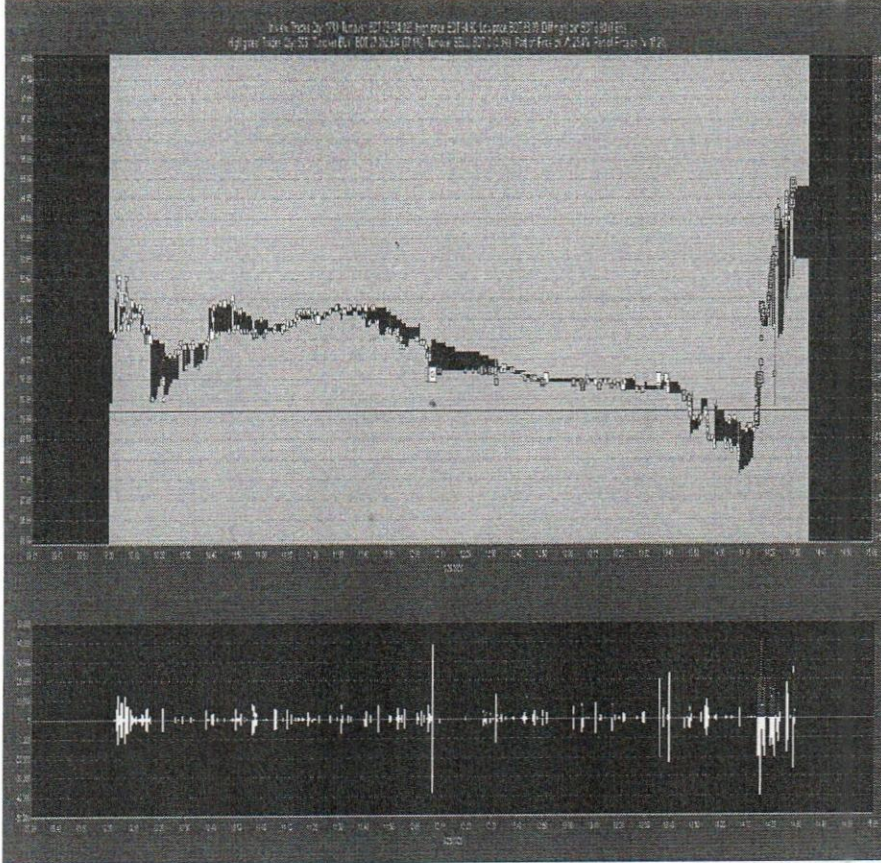


Thus it seems that Mr. Md. Jashim Uddin was actively trying to lift the price higher than YCP of Tk. 78.50. At the end of the day price of EASTERNINS share was increased by Tk. 6.10 from YCP to closing price at 84.60.

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

BO ID # 1204480063663699, 1205150063663699, 1205150063663712, 1604530063663699, 1604530065499362,  
1204480063663712, 1205150065499362, 1604530063663712,  
1205150066057561

25.08.2020

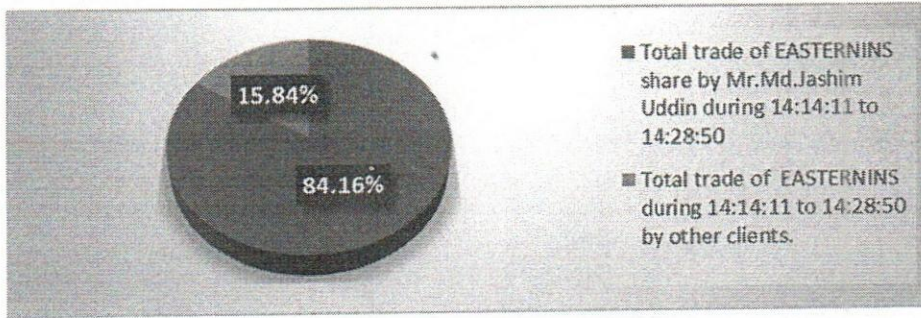


*(Handwritten signature)*

## বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

It is observed in the above graph that on 25.08.2020, total number of trades of EASTERNINS in the market was 1783, whereas number of trades executed by Md. Jashim Uddin was 506 which is approximately 28.38% of the total number of trades in the market. Again, total turnover of EASTERNINS in the market on that day was BDT 73,004,020 whereas buy turnover by the said clients was BDT 27,052,834 which is approximately 37.06% of the total turnover in the market. It is evident that the client had major participation in the market on 25.08.2020 in trading of EASTERNINS share.

On 25.08.2020, Mr. Md. Jashim Uddin started series of trading at 14:14:11 at price Tk. 88.80 and induced the same to rise to Tk. 94.90 at 14:28:50. It can be observed from the above graph that Mr. Md. Jashim Uddin executed significant trades during this time period. From 14:14:11 to 14:28:50, Mr. Md. Jashim Uddin bought 226000 shares of EASTERNINS compared to the total traded share of 268521 as shown in the following Pie Chart.



Thus it seems that Mr. Md. Jashim Uddin was actively trying to lift the price higher than YCP of Tk. 89.20. At the end of the day price of EASTERNINS share was increased by Tk. 2.80 from YCP to closing price at 92.00.

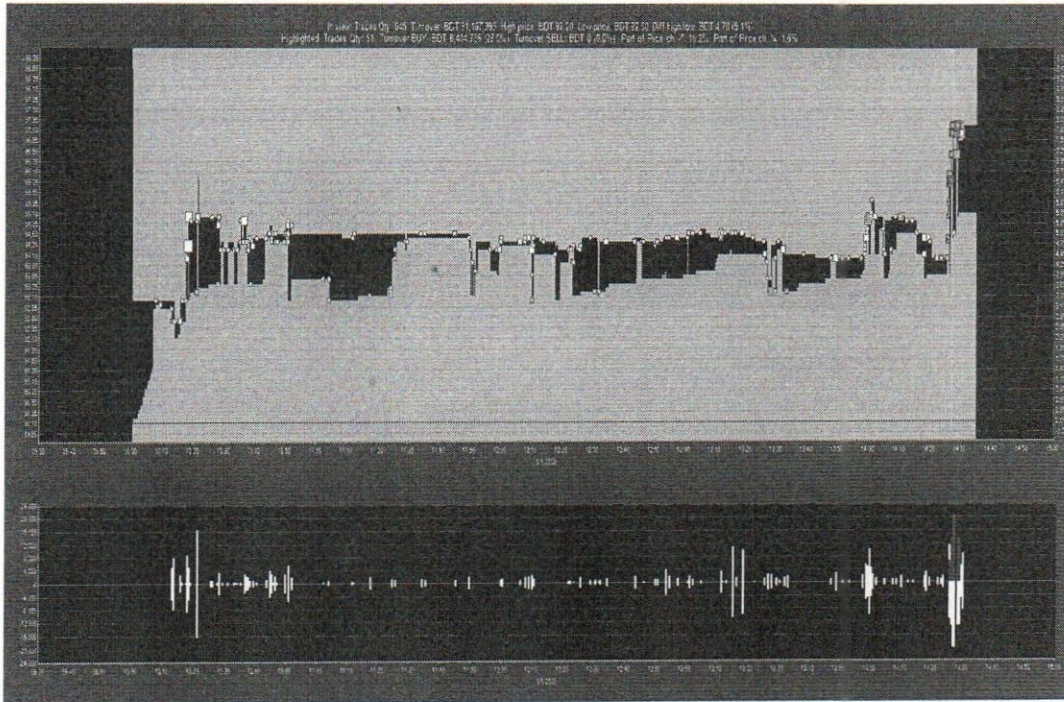


বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

“মুজিববর্ষের অঙ্গীকার  
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

BO ID # 1204480063663699, 1205150063663699, 1205150063663712, 1604530063663699, 1604530065499362,  
1204480063663712, 1205150065499362, 1604530063663712,  
1205150066057561

01.09.2020

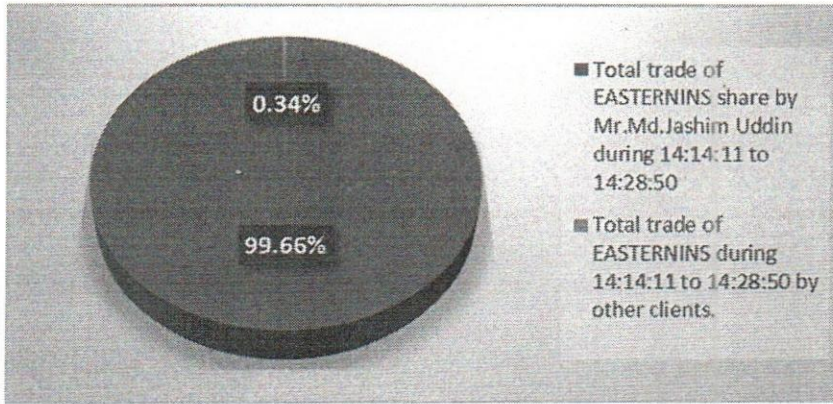


*[Handwritten signature]*

## বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

It is observed in the above graph that on 01.09.2020, total number of trades of EASTERNINS in the market was 645, whereas number of trades executed by Md. Jashim Uddin was 91 which is approximately 14.10% of the total number of trades in the market. Again, total turnover of EASTERNINS in the market on that day was BDT 31,167,395 whereas buy turnover by the said clients was BDT 8,404,738 which is approximately 27.00% of the total turnover in the market. It is evident that the client had participation in the market on 01.09.2020 in trading of EASTERNINS share.

On 01.09.2020, Mr. Md. Jashim Uddin started series of trading at 14:25:35 at price Tk. 94.00 and induced the same to rise to Tk. 97.20 at 14:28:50. It can be observed from the above graph that Mr. Md. Jashim Uddin executed significant trades during this time period. From 14:25:35 to 14:28:50, Mr. Md. Jashim Uddin bought 87,000 shares of EASTERNINS compared to the total traded share of 87300 as shown in the following Pie Chart.



Thus it seems that Mr. Md. Jashim Uddin was actively trying to lift the price higher than YCP of Tk. 90.10. At the end of the day price of EASTERNINS share was increased by Tk. 6.10 from YCP to closing price at 96.20.

decomparison of Mr. Md. Jashim Uddin with public market:

Date	Buy			Sale			Cost of shares sold			Stock Position			Comparison with the Market				
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sell (%)	Client Trade (%)
Opening Balance																	
22-07-2020	530002	56.88	30145316.30	0	0.00	0.00	0.00	0.00	1061811	47.12	50031890.86	1203205	57.30	9.98%	44.05%	14.00%	44.05%
23-07-2020	168447	62.25	10485984.10	0	0.00	0.00	0.00	0.00	1591813	50.37	80177207.16	1619674	63.00	9.95%	10.40%	10.40%	10.40%
24-07-2020	371800	69.19	25725740.00	355000	69.20	24566000.00	54.59	19379412.68	1777060	54.59	97009518.58	2185490	69.00	9.52%	17.01%	16.24%	17.01%
30-07-2020	276700	75.43	20872160.10	0	0.00	0.00	0.00	0.00	2053760	57.40	117881678.68	1233271	75.80	9.86%	22.44%	0.00%	22.44%
01-08-2020	262500	81.59	21418049.70	225685	82.14	18537318.50	60.14	13572681.48	2090575	60.14	125727046.90	1643016	78.50	3.56%	15.98%	13.74%	15.98%
02-08-2020	110620	83.96	9287510.90	71914	84.45	6072948.60	61.34	4410984.45	2129281	61.34	130603573.36	1194945	84.60	7.77%	9.26%	6.00%	9.26%
05-08-2020	51000	82.20	4192366.00	0	0.00	0.00	0.00	0.00	2180281	61.83	134795939.36	1142801	81.40	-3.78%	4.46%	0.00%	4.46%
06-08-2020	27610	77.68	2144781.00	264793	78.09	20678122.40	62.02	16423339.81	1943098	62.02	120517380.54	931162	76.90	-5.53%	2.97%	28.44%	31.40%
09-08-2020	6000	80.24	481462.00	10000	80.07	800717.00	62.08	620794.04	1939098	62.08	120378048.50	731717	80.20	4.29%	0.82%	1.37%	2.19%
10-08-2020	11000	79.01	869057.00	36208	79.37	2873944.50	62.17	2251227.99	1913890	62.17	118995877.51	423656	78.60	-2.00%	2.60%	8.53%	11.14%
12-08-2020	59000	79.68	4701029.70	0	0.00	0.00	0.00	0.00	1972890	62.70	123696907.21	941873	79.30	0.89%	6.26%	0.00%	6.26%
13-08-2020	0	0.00	0.00	15000	86.90	1303500.00	62.70	940474.94	1957890	62.70	122756432.27	1182621	86.00	8.45%	0.00%	1.27%	1.27%
17-08-2020	242700	84.92	20608909.90	484226	84.37	40853098.50	65.15	31546642.57	1716364	65.15	111818699.60	1695086	82.30	-3.97%	14.32%	28.57%	42.88%
18-08-2020	27300	78.64	2146905.40	0	0.00	0.00	0.00	0.00	1743664	65.36	113965605.00	389428	79.90	-2.92%	7.01%	0.00%	7.01%
19-08-2020	70000	81.79	5725299.10	48950	76.92	3765280.00	65.99	3230405.28	1764714	65.99	116460498.82	869182	78.40	-1.88%	8.05%	5.69%	13.69%
20-08-2020	100	78.20	7820.00	0	0.00	0.00	0.00	0.00	1764814	65.99	116468318.82	570575	80.70	2.93%	0.02%	0.00%	0.00%
23-08-2020	25000	86.43	2160765.20	67404	88.05	5935104.00	66.28	4467545.11	1722410	66.28	114161538.91	739946	87.90	8.92%	3.38%	9.14%	14.90%
25-08-2020	296000	91.39	27052833.70	0	0.00	0.00	0.00	0.00	2018410	69.96	141214372.61	801279	92.00	3.14%	36.94%	0.00%	36.94%



Date	Qty	Price	Block Sale Amount	Block Sale Qty	Block Sale Price	Total Buy Qty	Total Buy Price	Total Buy Amount	Total Sale Qty	Total Sale Price	Total Sale Amount	Cost of Shares Sold Price	Cost of Shares Sold Amount	Qty	Price	Stock Position Amount	
26-08-2020	235635	97.03	22863415.40	0	0.00	0.00	0.00	0.00	0.00	2254045	72.79	164077788.01	740697	96.80	5.22%	31.81%	0.00%
27-08-2020	2000	95.00	190000.00	7000	94.20	659400.00	72.81	509685.98	2249045	2249045	72.81	163758102.03	243555	95.60	-1.24%	0.82%	2.87%
30-08-2020	10000	92.20	921960.00	0	0.00	0.00	0.00	0.00	2259045	2259045	72.90	164680062.03	278594	90.10	-5.75%	3.59%	0.00%
01-09-2020	87000	96.61	8404738.20	0	0.00	0.00	0.00	0.00	2346045	2346045	73.78	173084800.23	327970	96.20	6.77%	26.53%	0.00%
02-09-2020	229120	98.99	22679923.00	184700	99.36	18352649.00	76.02	14040942.77	2390465	2390465	76.02	181723780.46	846916	98.60	2.49%	27.05%	21.81%
03-09-2020	732290	100.15	73339547.50	659714	101.48	66946691.80	81.68	53884742.27	2463041	2463041	81.68	201178585.69	2245757	97.00	-1.62%	32.61%	29.38%
06-09-2020	18383	99.57	1830315.80	0	0.00	0.00	0.00	0.00	2481424	2481424	81.81	203008901.49	221379	98.80	1.86%	8.30%	0.00%
07-09-2020	0	0.00	0.00	13635	100.40	1368904.00	81.81	1115499.15	2467789	2467789	81.81	201893402.34	156631	99.30	0.51%	0.00%	8.71%
08-09-2020	80	100.00	8000.00	24515	99.90	2449093.50	81.81	2005622.21	2443354	2443354	81.81	199895780.13	82890	98.60	-0.70%	0.10%	29.58%
09-09-2020	0	0.00	0.00	25349	99.71	2527577.30	81.81	2073853.45	2418005	2418005	81.81	197821926.68	159200	100.70	2.13%	0.00%	15.92%
10-09-2020	0	0.00	0.00	47226	102.37	4834387.20	81.81	3863655.50	2370779	2370779	81.81	193958271.18	184446	102.70	1.99%	0.00%	25.60%
11-09-2020	0	0.00	0.00	3790	102.82	389692.00	81.81	310067.64	2366989	2366989	81.81	193648203.54	158080	102.30	-0.39%	0.00%	2.40%
13-09-2020	19257	103.40	1991202.20	0	0.00	0.00	0.00	0.00	2386246	2386246	81.99	195639405.74	1091121	103.00	0.68%	1.76%	0.00%
<b>Total</b>	<b>3869544</b>	<b>82.76</b>	<b>320255092.20</b>	<b>2545109</b>	<b>87.59</b>	<b>222914428.30</b>	<b>68.62</b>	<b>174647577.32</b>	<b>2386246</b>	<b>81.99</b>	<b>195639405.74</b>						

অ্যান্ড এক্সচেঞ্জ কমিশন

above it was observed that the client conducted trade more than 44.05%, 42.88%, 48.86% and 61.98% on 27.07.20, 17.08.20, 02.09.20 and 03.09.20

rate (including block market) of Mr. Md. Jashim Uddin is given below:

Block Buy Price	Block Buy Amount	Block Sale			Total Buy			Total Sale			Cost of Shares Sold			Stock Position		
		Qty.	Price	Amount	Qty.	Price	Amount	Qty.	Price	Amount	Price	Amount	Qty.	Price	Amount	
0.00	0.00	450000	52.00	23400000.00	3869544	82.76	320255092.20	2995109	82.24	246314428.30	68.24	204391482.83	1936246	85.68	65895307.33	

*(Handwritten signature)*

পূজিবাবর্ষের অঙ্গীকার  
 মনন অধ্যয়নের উৎস হবে পূজিবাজার

3. Aggressive Trade: বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

Moreover, after analyzing trade report it was found that in favor of BO ID # 1205150063663699 and 1205150065499362 aggressive buy orders were submitted and executed repetitively. Summary of the aggressive trading is as follows:

Date	Instrument	'Side	Member	Client	Price		Matched
					Limit	Exec	
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.2	54	1480
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.20	54.10	3000
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.80	54.20	2441
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.80	54.40	10100
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.80	54.50	1493
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	54.8	54.7	20000
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	55.00	54.90	2000
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	55.90	55.50	2500
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	55.90	55.80	7500
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	57.30	57.00	7000
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	57.30	57.10	20000
27-07-20	EASTERNINS	Bid	BDF	1205150063663699	57.30	57.20	44550
27-07-20	EASTERNINS	Bid	BDF	1205150065499362	57.30	56.90	4500
27-07-20	EASTERNINS	Bid	BDF	1205150065499362	57.30	57.00	30100
27-07-20	EASTERNINS	Bid	BDF	1205150065499362	57.30	57.20	6720
28-07-20	EASTERNINS	Bid	BDF	1205150063663699	62.00	61.80	2500
28-07-20	EASTERNINS	Bid	BDF	1205150063663699	62.00	61.90	5680
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.00	9851
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.10	20000
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.30	5635
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.40	15500
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.50	40599
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.60	8415
30-07-20	EASTERNINS	Bid	BDF	1205150065499362	75.90	75.30	530
30-07-20	EASTERNINS	Bid	BDF	1205150065499362	75.90	75.40	3000
30-07-20	EASTERNINS	Bid	BDF	1205150065499362	75.90	75.60	10403
30-07-20	EASTERNINS	Bid	BDF	1205150065499362	75.90	75.70	53260
30-07-20	EASTERNINS	Bid	BDF	1205150065499362	75.90	75.80	2807
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.30	2985
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.50	130
30-07-20	EASTERNINS	Bid	BDF	1205150063663699	75.90	75.80	26243
03-08-20	EASTERNINS	Bid	BDF	1205150065499362	82.40	82.20	23949
03-08-20	EASTERNINS	Bid	BDF	1205150065499362	82.40	82.30	40983
03-08-20	EASTERNINS	Bid	BDF	1205150065499362	82.50	82.40	15932
05-08-20	EASTERNINS	Bid	BDF	1205150063663699	84.50	84.40	6235
06-08-20	EASTERNINS	Bid	BDF	1205150065499362	78.00	77.50	1200



“মুজিববর্ষের অঙ্গীকার  
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

Date	Company	Type	Instrument	BO ID	Rate	Market Rate	Quantity
06-08-20	EASTERNINS	Bid	BDF	1205150065499362	77.50	77.10	2000
06-08-20	EASTERNINS	Bid	BDF	1205150065499362	78.00	77.90	2582
09-08-20	EASTERNINS	Bid	BDF	1205150065499362	81.00	80.00	4988
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.00	96.90	3750
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.30	96.90	1000
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.30	97.00	4220
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.30	97.10	5000
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.30	97.20	7882
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.50	97.30	1048
26-08-20	EASTERNINS	Bid	BDF	1205150063663699	97.50	97.40	5000
Total							496691

Here, it is observed that the company submitted buy offers in favor of mentioned client named MD. Jashim Uddin (BO ID # 1205150063663699) and SHIKHITO BEKAR KENDRIOY SONCHOY & R.S.S.L (BO ID # 1205150065499362) at higher rate than the available market rates.

Realized/unrealized capital gain/loss of Mr. Md. Jashim Uddin through the trading of the abovementioned accounts is given below:

Realized Capital gain(loss)per unit	14.00	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	20.51%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	41922945.47	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (14-09-2020)	103.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	17.32	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	20.22%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	33537837.77	Quantity of Stock Positon x Unrealized gain (loss) per unit

It was also observed that Mr. Md. Jashim Uddin was involved in trading of EASTERNINS share which resulted no change in beneficial ownership on different date(s) through 6 accounts. Out of which 3 accounts were maintained with SBL Capital Management Limited, traded through Eminent Securities Limited and 3accounts were maintained with BD Finance Securities Limited. As a result, 88670 shares of “EASTERNINS” were executed in 42 howla(s) where the account holder acted as both buyer and seller as shown below:

TRADE DATE	TRADE TIME	INSTRUMENT	TRADE VOL.	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOIDSELLER	MARKET TYPE
03/08/2020	11:35:59	EASTERNINS	2068	82.6	DSEBDF	30101	1205150065499362	DSEBDF	30107	1205150066057561	Public
04/08/2020	12:52:51	EASTERNINS	3000	85.2	DSEFER	S2118	1604530063663712	DSEBDF	30107	1205150066057561	Public
04/08/2020	12:52:51	EASTERNINS	1000	85.2	DSEFER	S2118	1604530063663712	DSEBDF	30107	1205150066057561	Public
04/08/2020	14:24:20	EASTERNINS	3000	84.7	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:24:20	EASTERNINS	1799	84.7	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:24:30	EASTERNINS	326	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:24:30	EASTERNINS	2674	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:24:30	EASTERNINS	1674	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:24:30	EASTERNINS	3000	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

“মুজিববর্ষের অঙ্গীকার  
উন্নয়ন-অর্থায়নের উৎস হবে পুঁজিবাজার”

04/08/2020	14:25:37	EASTERNINS	1326	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:25:37	EASTERNINS	3000	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:25:37	EASTERNINS	264	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
04/08/2020	14:25:37	EASTERNINS	3000	84.9	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:28:45	EASTERNINS	500	78.6	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:29:42	EASTERNINS	320	79.5	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
10/08/2020	14:29:42	EASTERNINS	500	79.5	DSEFER	S2118	1604530063663712	DSEBDF	30101	1205150065499362	Public
19/08/2020	14:26:17	EASTERNINS	370	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	130	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	130	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	370	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	130	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:17	EASTERNINS	500	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:24	EASTERNINS	370	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:24	EASTERNINS	130	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
19/08/2020	14:26:24	EASTERNINS	370	79	DSEBDF	30071	1205150063663699	DSEFER	S2118	1604530063663712	Public
03/09/2020	11:30:04	EASTERNINS	11719	100.2	DSEFER	S2117	1604530063663699	DSEFER	S2119	1604530065499362	Public
03/09/2020	11:30:11	EASTERNINS	20000	100.2	DSEFER	S2117	1604530063663699	DSEFER	S2119	1604530065499362	Public
03/09/2020	11:30:19	EASTERNINS	20000	100.2	DSEFER	S2117	1604530063663699	DSEFER	S2119	1604530065499362	Public
Total			88670								

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক জুন ১৪, ২০২২ তারিখ নং- বিএসইসি/এনফোর্সমেন্ট/৩২৮২/২০২২/৮৬২ স্মারকমূলে Mr. Md. Jashim Uddin - কে ২৭ জুন, ২০২২ তারিখে কারণ প্রদর্শনসহ শুনানীতে উপস্থিত হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mr. Md. Jashim Uddin নিম্নলিখিত বক্তব্য দাখিল করেন;

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

*"With due respect, I hereby would like to take the opportunity to explain my position in respect of your letter BSEC/Enforcement/3282/2022/862 dated June 14, 2022 regarding share trading "EASTERNINS". This has reference to the above-mentioned subject I 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. I 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, I invested my whole hearted effort, money and time to the development of Bangladesh Capital Market. I analyzed, summarized and taken decision to invest in the mentioned share of "EASTERNINS" considering the development of Insurance Sector. I have no other intention but to invest honestly in the mentioned shares like any other shares to get capital gain.*

*I have given fresh buy and sale order to my 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 my trades were purely unintentional or inadvertent mistakes which are evident in quantity of trades in comparison to total trades as per your report.*

*I am honestly would like to saying here that, I cordially want to the development of Capital Market that is why I invested my whole hearted effort, money and time to the market side by side I made involve of my friends, relatives, well-wishers and many others person in this market as current management of Bangladesh Securities and Exchange Commission sincerely trying to stabilize and develop of Capital Market. As I fully involved and cordial to the market so, I do not do any work or transaction intentionally or bad motive. Nevertheless, in the time of transaction I can not all time remain careful as I maintain several portfolio with different houses if any mistakes or non-compliance happened in my trades were purely unintentional. So I am really sorry for my unintentional mistakes which happened in the trading of "EASTERNINS".*

*I humbly would like to mention here that, although realized capital gain shows in your letter by trading "EASTERNINS" but at the present time I am in huge loss in my several portfolios as I invested in different company's shares, therefore I am sincerely requesting you to consider me softly observing all over the position of myself.*

*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 above-mentioned 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."*

যেহেতু, Mr. Md. Jashim Uddin -এর উপরোক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক সেহেতু এক্ষেত্রে Mr. Md. Jashim Uddin -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Md. Jashim Uddin - এর উপরোক্ত কর্মকান্ডের ফলে Securities and Exchange Ordinance, 1969 এর Section 17(e)(iii) এবং 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Mr. Md. Jashim Uddin -এর উপরোক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;



## বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

যেহেতু, Mr. Md. Jashim Uddin -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. Md. Jashim Uddin - 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. Md. Jashim Uddin - কে ০১ (এক) কোটি টাকা অর্থ দণ্ডে দণ্ডিত 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 আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

  
মোঃ আবদুল হালিম  
কমিশনার

### বিতরণ:

১। Mr. Md. Jashim Uddin  
BO ID (1204480063663699)  
IIDFC Securities Limited  
PFI Tower (3rd Floor, South Side),  
56-57, Dilkusha C/A,  
Dhaka-1000.