

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৪৩/২০২২/১১৬৯

তারিখঃ অক্টোবর ২০, ২০২৫

Mr. Mohammad Kamrul Hasan

(BO ID: 1602770067892350)

House No. 14/Kha, Flat # 5-A,

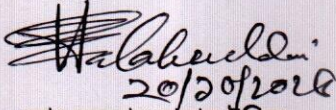
Shahjadpur, Gulshan -2, Dhaka- 1212.

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বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৪৩/২০২২/১১৬৮ তারিখঃ অক্টোবর ২০, 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, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এসআরআইসি, বিএসইসি। (BSEC/SRMIC/2021-203)

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

নং-বিএসইসি/এনফোর্সমেন্ট/৩৩৪৩/২০২২/১১৬৮

তারিখঃ অক্টোবর ২০, 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, BSEC Enquiry Order No-BSEC/SRMIC/2021-203 dated 01 November 2021 দ্বারা প্রদত্ত ক্ষমতাবলে কমিশন দ্বারা গঠিত অনুসন্ধান (Enquiry) কমিটি এনআরবি ব্যাংক লিমিটেডের পুঁজিবাজার বিনিয়োগে অনিয়ম এবং অন্যান্য অনিয়ম সম্পর্কে অনুসন্ধান (Enquiry) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Observations and Findings:

The Enquiry Team randomly examined the documents collected from different TREC holder Companies and NRB Bank Limited regarding investment in capital market and share trading of various securities. After examining and securitizing the relevant documents, the Enquiry Team patronized the share trading of Pioneer Insurance Company Limited (PIONEERINS); since NRB Bank Limited breached the capital market limits in terms of 10% of Bank's paid up Capital and 5% of Total Capital of the Bank in holding of that share violating Bank Companies Act, 1991. Now, the details findings are as follows:

As per the documents provided by NRB Bank Limited, they maintained 09 BO accounts at various TREC Holder Companies and Merchant Banks which are given below:

BO accounts of NRB Bank Limited:

Name	TREC Holder/Merchant Bank Name	BO ID	Code
NRB Bank Limited	BRAC EPL Stock Brokerage Limited	1201820053754332	G3530
	City Bank Capital Resources Limited	1605170055935143	CN354
	City Brokerage Limited	1204500055935143	C8013
	City Brokerage Limited	1204500058623240	C201
	City Brokerage Limited	1204500068973969	C199
	DBL Securities Limited	1201630055935143	8989
	IDLC Securities Limited	1203680055352672	C109
	Vertex Stock & Securities Limited	1206080073499003	V01200

It is mentionable that NRB Bank Limited executed share trading of PIONEERINS with BRAC EPL Stock Brokerage Limited (client code # G3530), City Brokerage Limited (C199 and C201), Dhaka Bank Securities Limited (client code # 8989) and IDLC Securities Limited (client code # C109) respectively.

As per the company's internal audit report regarding the issue, it was stated that the CFO position looks after the Investment Banking Unit's activity and Mr. Md. Kamrul Hasan started to look after the activity of the IBU consequent upon his joining on January 04, 2021. As per their report, assignments of Mr. Kamrul are as follows:

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.scc.gov.bd

Assignment	Date	Authority/Signatory
Chief Financial Officer		MD & CEO
Treasury (activity monitoring)	06-01-2021	Head of Human Resources
Reporting authority of Investment Banking	06-11-2018	Board of Directors

BO accounts of Mr. Kamrul and his associates:

Name	Code	BO ID	TREC Holder's Name	Status	Remarks
Mohammad Kamrul Hasan	C2026	1602770067892350	Abaci Investments Limited	Active	Own
Mohammad Kamrul Hasan	01976	1203410017172985	Phoenix Securities Ltd	Active	Own
Anjuman Ara	10503	1204480068250170	IIDFC Securities Limited	Closed On 26-OCT-21	Wife of Mr. Kamrul Hasan
Anjuman Ara	0167	1206090068250170	Asif Ahmad & Company Limited	Closed On 16-NOV-21	
Taslina Begum	B5938	1204030068167599	Lanka Bangla Securities Limited Banani	Active	Relative of Mr. Kamrul Hasan
Jasmin Akter	1055	1203410014331833	Phoenix Securities Limited	Closed On 30-JUN-15	Sister of Mr. Kamrul Hasan
Jasmin Akter	1056	1203410014331991		Closed On 27-JUN-12	
Md. Mehedi Hasan	1059	1203410014332530		Active	Brother of Mr. Kamrul Hasan
Md. Mehedi Hasan	1061	1203410014332704		Active	
Md. Mehedi Hasan	10504	1204480014332704	IIDFC Securities Limited	Closed On 28-SEP-21	
Md.Mehedi Hasan	FS0076	1605140046726904	First Security Islami Capital & Investment Ltd	Active	

It is mentionable that Mr. Kamrul Hasan executed share trading of PIONEERINS only with Abaci Investments Limited (client code # C2026) and IIDFC Securities Limited (client code # 10503 and 10504).

A. MR. MOHAMMAD KAMRUL HASAN, CFO OF THE NRB BANK LTD. AND HIS ASSOCIATES:

Mr. Mohammad Kamrul Hasan is Chief Financial Officer of NRB Bank Limited. It is already mentioned that he is the signatory person of all transactions of buy/sale/pay-in slip in favour of NRB Bank Limited and he is one of the key persons in maintaining the investment fund of NRB Bank Limited in capital market.

On the other hand, Mr. Kamrul maintains 10 (ten) BO account in various TREC Holder Companies and Merchant Banks. Among them, he traded the shares of PIONEERINS through 03 (three) BO accounts namely Mohammad Kamrul Hasan, Anjuman Ara (Wife of Mr. Kamrul) and Md. Mdhedhi Hasan (Brothr of Mr. Kamrul) which trade pattern are given below:

1. Individual Trade Pattern of Mr. Mohammad Kamrul Hasan is available in the Appendix-2.
2. Total Buy and sale of Mr. Mohammad Kamrul Hasan and his associates (from 24.04.2021 to 09.09.2021):

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Total Buy			Total Sale			Stock Position		
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
189,195	130.99	24,783,070.34	154,195	163.00	25,134,445.65	35,000	130.99	4,584,727.20

3. Total realized and unrealized gain/loss of Mr. Mohammad Kamrul Hasan and his associates during the period from 24.04.2021 to 09.09.2021:

Realized Capital gain(loss) per unit	32.01	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	24.44%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain (loss) TK	4,936,102.51	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (31-10-2021)	118.20	Closing Price
Unrealized gain(loss) per unit	-12.79	Closing Price - Average Price of Stock Position
Unrealized gain(loss) %	-9.77%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	(447,727.20)	Quantity of Stock Positon x Unrealized gain (loss) per unit
Total realized and unrealized gain/loss	4,488,375.31	Sum of total realized and unrealized gain/loss

Observation:

From the trade pattern mentioned above, it is observed that Mr. Kamrul and his associates bought 189,195 shares of PIONEERINS at average price BDT 130.99 and sold 154,195 shares at average price BDT 163.00 from 24.05.2021 to 05.09.2021. During the period, he made a realized gain of BDT 4,936,102.65 and total of realized and unrealized gain/loss is BDT 4,488,375.31 whereas NRB Bank Limited made a realized loss of BDT 47,025,982.92 and unrealized loss of BDT -196,153,141.17 and total realized and unrealized gain/loss is BDT -196,153,141.17 during the period from 25.04.2021 to 09.09.2021 where he is a signatory person.

4. Comparative Analysis of the Daily Transection:

Some of daily trading activities of NRB Bank Limited and Mr. Mohammad Kamrul Hasan with the highest and lowest price of PIONEERINS in both the exchanges are given below:

Daily Trade Pattern of NRB Bank Limited and Mr. Kamrul:

09.05.2021

NRB Bank Limited bought 2,022,582 shares of PIONEERINS at BDT **94.96** in CSE through Client code # C199 of City Brokerage Limited where-

Particulars	DSE	CSE
Highest price	95.50	95.00
Lowest price	84.60	86.00
Buy price	94.96	94.96

12.05.2021

NRB Bank Limited bought 615,000 shares of PIONEERINS at BDT 112.49 in CSE through Client code # G3530 of BRAC EPL Stock Brokerage Limited where-

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Particulars	DSE	CSE
Highest price	110.50	112.50
Lowest price	103.70	100.00
Buy price	112.49	112.49

17.05.2021

NRB Bank Limited bought 786,718 shares of PIONEERINS at BDT **118.40** in CSE through Client code # 8989 of Dhaka Bank Securities Limited.

Whereas, on the same day 398,930 shares of PIONEERSINS were sold at BDT **108.17** in DSE through City Brokerage Limited, code # C199 – where

Particulars	DSE	CSE
Highest price	110.60	119.00
Lowest price	106.00	108.00
Buy price by NRB Bank Limited	118.40	118.40
Sale price by Mr. Kamrul	108.17	108.17

18.05.2021

NRB Bank Limited sold 1,598,542 shares of PIONEERINS at BDT **106.98** in CSE through client code # C199 of City Brokerage Limited where

Particulars	DSE	CSE
Highest price	113.00	113.00
Lowest price	101.50	105.10
Sale price by NRB Bank Limited	106.98	106.98

20.05.2021

NRB Bank Limited sold 1,800,319 shares of PIONEERINS at BDT **115.73** in CSE through client code # C199 of City Brokerage Limited where

Particulars	DSE	CSE
Highest price	112.00	116.00
Lowest price	104.20	104.10
Sale price by NRB Bank Limited	115.73	115.73

23.05.2021

NRB Bank Limited sold 44,872 shares of PIONEERINS at BDT 119.07 in DSE through client code #8989 of Dhaka Bank Securities Limited and also sold 615,000 shares in DSE at 114.07 through the same client code where

Particulars	DSE	CSE
Highest price	120.30	118.40
Lowest price	113.20	114.00
Sale price by NRB Bank Limited	119.07	119.07

24.05.2021

NRB Bank Limited sold 1,948,300 shares of PIONEERSINS at BDT **112.76** in DSE through City Brokerage, code # C199;

On the other hand, Mr. Kamrul bought 76,000 shares of PIONEERSINS at BDT **116.57** in his own account through Abaci Investments Limited, code # C2026; where

Particulars	DSE	CSE
Highest price	122.00	124.70
Lowest price	112.10	114.50
Sale price by NRB Bank Limited	112.76	112.76
Buy price by Mr. Kamrul	116.57	116.57

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

25.05.2021

NRB Bank Limited sold 820,678 shares of PIONEERSINS at BDT **110.06** in CSE through City Brokerage Limited, client code # C199 and 741,846 shares of PIONEERSINS at BDT **120.41** in CSE through Dhaka Bank Securities Limited, Client code # 8989; where

Particulars	DSE	CSE
Highest price	124.40	126.90
Lowest price	113.10	110.00
Sale price by NRB Bank Limited	110.06 120.41	110.06, 120.41

30.05.2021

NRB Bank Limited bought 1,950,000 shares of PIONEERSINS at BDT **147.84** in DSE through City Brokerage Limited, client code # C199 and bought 1,021,000 shares of PIONEERSINS at BDT **147.29** in DSE through Dhaka Bank Securities Client code # 8989.

On the other hand, Mr. Kamrul sold 76,000 shares of PIONEERSINS at BDT **146.38** in his own account through Abaci Investments Limited, code # C2026; where

Particulars	DSE	CSE
Highest price	147.90	144.00
Lowest price	132.50	129.00
Buy price by NRB Bank Limited	147.84 147.29	147.84 147.29
Sale price by Mr. Kamrul	146.38	146.38

01.06.2021

NRB Bank Limited bought 1,210,300 shares of PIONEERSINS at BDT **151.77** in DSE through Dhaka Bank Securities client code # 8989 and sold 360,000 shares of PIONEERSINS at BDT **150.70** in DSE through IDLC Securities Limited, client code # C109

On the other hand, Mr. Kamrul bought 6,850 shares of PIONEERSINS at BDT **148.14** in his own account through Abaci Investments Limited, code # C2026; where

Particulars	DSE	CSE
Highest price	152.00	148.60
Lowest price	143.00	125.00
Buy price by NRB Bank Limited	151.77	151.77
Sell price by NRB Bank Limited	150.70	150.70
Buy price by Mr. Kamrul	148.14	148.14

07.06.2021

NRB Bank Limited

- bought 225,000 shares of PIONEERSINS at BDT **166.00** in DSE through City Brokerage Limited, code # C199;
- bought 325,000 shares of PIONEERSINS at BDT **166.00** in DSE through City Brokerage Limited, code # C201;
- bought 632,460 shares of PIONEERSINS at BDT **166.59** in DSE through Dhaka Bank Securities Ltd, client code # 8989;
- bought 388,000 shares of PIONEERSINS at BDT **165.79** in DSE through IDLC Securities Limited, code # C109; but
- sold 167,004 shares of PIONEERSINS at BDT **158.24** in DSE through Dhaka Bank Securities Limited, client code # 8989;

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

On the other hand, Mr. Kamrul **bought** 37,000 shares of PIONEERSINS at **BDT 140.49** in his own account through Abaci Investments Limited, code # C2026; where

Particulars	DSE	CSE
Highest price	169.20	153.80
Lowest price	153.20	130.00
Buy price by NRB Bank Limited	166.00	166.00
	166.59	166.59
	165.79	165.79
Sale price by NRB Bank Limited	158.24	158.24
Buy price by Mr. Kamrul	140.49	140.49

10.06.2021

NRB Bank Limited

- bought 97,000 shares of PIONEERSINS at BDT 193.90 in DSE through City Brokerage Limited, code # C201
- bought 603,500 shares of PIONEERSINS at BDT 196.09 in DSE through Dhaka Bank Securities Ltd, client code # 8989;
- bought 512,000 shares of PIONEERSINS at BDT 193.90 in DSE through IDLC Securities Limited, client code # C109;
- sold 2,050,000 shares of PIONEERSINS at BDT 174.14 in DSE through City Brokerage Limited, client code # C199;

On the other hand, Mr. Kamrul **bought** 1,008 shares of PIONEERSINS at BDT 185.65 and sold 22,195 shares at BDT 187.67 in his own account through Abaci Investments Limited, code#C2026; where

Particulars	DSE	CSE
Highest price	198.40	199.00
Lowest price	182.90	173.00
Buy price by NRB Bank Limited	193.90	193.90
	196.09	196.09
	193.90	193.90
Sale price by NRB Bank Limited	174.14	174.14
Buy price by Mr. Kamrul	185.65	185.65
Sale price by Mr. Kamrul	187.67	187.67

15.06.2021

NRB Bank Limited

- bought 154,300 shares of PIONEERSINS at BDT209.35 in DSE through Dhaka Bank Securities Limited, client code # 8989;
- bought 393,100 shares of PIONEERSINS at BDT 212.45 in DSE through City Brokerage Limited, client code # C199;
- sold 857,000 shares of PIONEERSINS at BDT 205.61 in DSE through City Brokerage Limited, client code # C201; and
- sold 504,600 shares of PIONEERSINS at BDT 204.10 in DSE through IDLC Securities Limited, code # C109; where

Particulars	DSE	CSE
Highest price	215.80	219.70
Lowest price	200.00	207.00
Buy price by NRB Bank Limited	209.35	209.35
	212.45	212.45
Sale price by NRB Bank Limited	205.61	205.61
	204.10	204.10

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

16.06.2021

NRB Bank Limited

- bought 4,300 shares of PIONEERSINS at BDT**203.76** in DSE through City Brokerage Limited, client code # C199;
- bought 840,000 shares of PIONEERSINS at BDT**209.02** in DSE through City Brokerage Limited, client code # C201;
- bought 331,722 shares of PIONEERSINS at BDT **203.98** in DSE through Dhaka Bank Securities Limited, client code # 8989;
- bought 490,000 shares of PIONEERSINS at BDT **208.90** in DSE through IDLC Securities Limited, client code # C109; and
- sold 1,170,662 @**202.72** shares of PIONEERSINS at BDT **202.72** in DSE through Dhaka Bank Securities Limited, client code # 8989; where

Particulars	DSE	CSE
Highest price	210.50	215.00
Lowest price	200.30	195.50
Buy price by NRB Bank Limited	203.76 209.02 203.98	203.76 209.02 203.98
Sale price by NRB Bank Limited	202.72	202.72

17.06.2021

NRB Bank Limited bought 805,510 shares of PIONEERSINS at **208.82** in DSE through Dhaka Bank Securities Limited, client code # 8989; and sold 823,452 shares of PIONEERSINS at **201.19** in DSE through City Brokerage Limited, client code # C199; where

Particulars	DSE	CSE
Highest price	212.90	209.00
Lowest price	200.00	209.00
Buy price by NRB Bank Limited	208.82	208.82
Sale price by NRB Bank Limited	201.19	201.19

20.06.2021

NRB Bank Limited

- bought 2,279,000 shares of PIONEERSINS at BDT **192.70** in DSE through City Brokerage Limited, client code # C199;
- sold 1,450,000 shares of PIONEERSINS at BDT **190.58** in DSE through City Brokerage Limited, code # C201;
- bought 1,354,150 shares of PIONEERSINS at BDT **199.17** in DSE through Dhaka Bank Securities Limited, client code # 8989; and
- sold 1,363,161 shares of PIONEERSINS at BDT **195.87** in DSE through Dhaka Bank Securities Limited, client code # 8989; where

Particulars	DSE	CSE
Highest price	204.80	197.00
Lowest price	183.90	191.00
Buy price by NRB Bank Limited	192.70 199.17	192.70 199.17
Sale price by NRB Bank Limited	190.58 195.87	190.58 195.87

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

22.06.2021

NRB Bank Limited

- bought 790,000 shares of PIONEERSINS at BDT 189.38 in DSE through City Brokerage Limited, client code # C201;
- sold 686,200 shares of PIONEERSINS at BDT 174.91 in DSE through City Brokerage Limited, client code # C201;
- bought 2,195,704 shares of PIONEERSINS at BDT 191.07 in DSE through Dhaka Bank Securities Limited, client code # 8989;
- sold 2,315,846 shares of PIONEERSINS at BDT 181.49 in DSE through Dhaka Bank Securities Limited, code # 8989; and
- bought 445,000 shares of PIONEERSINS at BDT 189.80 in DSE through IDLC Securities Limited, client code # C109; where

Particulars	DSE	CSE
Highest price	194.40	199.90
Lowest price	172.00	175.10
Buy price by NRB Bank Limited	189.38	189.38
	191.07	191.07
	189.80	189.80
Sale price by NRB Bank Limited	174.91	174.91
	181.49	181.49

Observation:

It was observed from the above that NRB Bank Limited bearing various client codes in various TREC Holder Companies executed transaction of PIONEERINS *by buying with about to highest price and selling with about to lowest price every day* during the period. Further observed that Mr. Kamrul Hasan (signatory person/authorized person in investment activities of NRB Bank Limited) *sold* the shares at comparatively lower price from the account of NRB Bank Limited, simultaneously *bought by Mr. Kamrul Hasan in his personal or associated BO account(s). On the other hand, Mr. Kamrul Hasan bought the shares* at comparatively higher price in accounts of NRB Bank Limited, simultaneously sold the shares at higher prices from his or associated BO account(s).

5. Comparative realized and unrealized gain/loss of NRB Bank Limited and Mr. Kamrul Hasan and his associates during the period from 25.04.2021 to 09.09.2021 are given below:

Name	Realized gain/loss	Unrealized gain/loss	Total gain/loss
NRB Bank Limited	-47,025,982.92	-149,127,158.24	-196,153,141.17
Mr. Mohammad Kamrul Hasan	4,936,102.50	-447,727.19	4,488,375.31

It is observed from the above that Mr. Kamrul and his associates made huge of gain by making loss NRB Bank Limited where Mr. Kamrul is a signatory person.

Therefore, it is evident that Mr. Mohammad Kamrul Hasan and his associates directly or indirectly involved in series of transactions of PIONEERINS which causes of raising of price of the share and making own profit ignoring that of NRB Bank Limited.

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Findings:

As per section 17 of the 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-

.....
(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;"

Contravention: The aforesaid activities, it appears that *Mr. Mohammad Kamrul Hasan* and his associates have violated Section 17 (e) (v) of **Securities and Exchange Ordinance, 1969 (XVII of 1969)** involving directly and indirectly in a series of transaction of shares of PIONEERINS.

Counter-party transaction between NRB Bank Limited and Mr. Sheikh Farook Ahmad:

After analyzing the DSE Trade Data, it was observed that NRB Bank Limited and Mr. Sheikh Farook Ahmad directly or indirectly involved in counterparty transaction of PIONEERINS share for a long time which may induce the investors to involve in the transaction of PIONEERINS and causes of raising the price of the share. Details are given in **Appendix – 04:**

Observation:

It is observed from the table given in **Appendix - 04** that NRB Securities Limited and Mr. Sheikh Farook Ahmad and his associates are directly or indirectly involved in counterparty transaction. It is mentionable that Mr. Kamrul is the signatory person of all BOIDs of NRB Bank Limited.

Comment:

From the above counterparty transaction (**Appendix-4**), it is also observed that almost all of trades are executed at negotiated prices between NRB Bank Limited (operated by Mr. Kamrul Hasan) and Mr. Sheikh Farook Ahmad in bulk quantity and on a deal basis during the period which causes NRB Bank Limited making looser and Mr. Farook Ahmad being gainer.

Findings:

As per section 17 of the 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, -*

(a) Employ any device, scheme or artifice, or engage in any act, practice or course of business, which operates or is intended or calculated to operate as a fraud or deceit upon any person;

.....



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.secc.gov.bd

- (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;”

Contravention: The aforesaid activities, it appears that NRB Bank Limited, Mr. Mohammad Kamrul Haasan and Mr. Sheikh Farook Ahmad and their associates have violated Section 17 (a) and 17(e) (v) of Securities and Exchange Ordinance, 1969 by involving directly and indirectly in a series of transaction of PIONEERINS in order to create the appearance of active trading of the said share and involving in counter party transaction at the negotiable prices and a deal basis as a fraud upon NRB Bank Limited.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ২৭, ২০২২ তারিখে বিএসইসি/এনফোর্সমেন্ট/৩২৭২/২০২২/৬৮০ স্মারকমূলে Mr. Mohammad Kamrul Haasan -কে মে ২৯, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখ মে ২৯, ২০২২ এ Mr. Mohammad Kamrul Haasan শুনানীতে উপস্থিত হয়ে ২৯.০৫.২০২২ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

“At the outset I would like to state that you have perhaps been supplied with inaccurate information designed to impugn my credibility and innocence. I would like to add that I am a victim of circumstance and a vested quarter is trying to turn me into a scapegoat to conceal their responsibility and incompetence. As such urge and request you that you take this reply into due consideration to unearth the real facts and thereby exonerate me of all wrongdoings and allegations.

I would like to add that, the statement of the said Notice which has not been specifically admitted herein shall be deemed to have been opposed. The page numbers and paragraph numbers mentioned in this reply to Show Cause Notice shall refer to the pages and paragraphs of the “Show cause cum notice for hearing: Non-compliance securities related laws” dated April 27, 2022 unless stated otherwise.

1. That your statements made in the third line of the third paragraph of page No. 1 of the Notice with title “**Observations and Findings**” stated that “After examining and scrutinizing the relevant documents, the Enquiry Team patronized the share trading of Pioneer Insurance Company Limited (PIONEERINS; since NRB Bank Limited breached the capital market limits in terms of 10% of Bank’s paid up Capital and 5% of Total Capital of the Bank in holding of that share violating Bank Companies Act, 1991.” Such statement is partially incorrect. Throughout the time in question, NRB Bank Limited always stayed within the capital limit of 10% of Bank’s Paid up Capital in holding of shares. The remaining information stated in page No. 1 are matters of record and as such I have no comments regarding their validity and relevance and you are under strict liability to proof thereof.
2. That in the second paragraph of page No. 2 of the Notice you have stated that, “As per company’s internal report regarding the issue, it was stated that the CFO position looks after

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

the Investment Banking Unit's activity and Mr. Md. Kamrul Hasan started to look after the activity of the IBU consequent upon his joining on January 04, 2021." Such statement is completely baseless and misleading. The Investment Banking Unit's activities were managed by the Investment Committee of the NRB Bank Limited which consisted of 6 members including the Managing Director of the Bank who was also the Chairman of the Committee, 2 Deputy Managing Directors, the Chief Risk Management Officer, a representative of the Investment Wing of the Bank and finally me as the CFO. All decisions in regards to investment were made in meetings of the Committee and under direct supervision of the Chairman of the Committee i.e. the MD of the Bank. It was the practice of the Committee that, the day-ending portfolio position would have been sent to each member of the Committee both in hard copy and through email. The members of Committee decided on different aspects of the investment portfolio including the present status of the portfolio, the profit-loss position, required provision, associated risks, possible direction for new investment etc. on regular basis. Therefore, it cannot be said that the CFO position alone or I as the CFO looked after the activities of the IBU as all the decisions made regarding the investment were made by the Committee and as such the decisions regarding investment and portfolio management were collective decisions, not attributable to any single member of the Committee i.e. me.

Furthermore, I being the fifth senior member in a committee of six persons, always carried out my duties under the strict instructions of the Committee and my sole duty was to execute/implement the decisions of the Committee. During my tenure as the CFO of the NRB Bank Limited, I often urged/requested the Committee to review some of their decisions. I repeatedly raised concerns regarding the impact of the exposure of PIONEERINS shares in the Bank portfolio. But, since I was nothing but a junior member of the committee, my concerns were never properly heeded by the Committee. I therefore executed the instructions of the Committee irrespective of my personal views. No member of the Committee ever raised any objection regarding my execution of their decisions at that time. As such, the Committee and the Committee alone should be held responsible for the trading of PIONEERINS shares.

3. The statements made in the paragraph No. 3 of page No. 2 of the Notice which states "*Mr. Kamrul said in his written statement dated 08 November 2021 that no BO account is maintained in the name of his spouse and relative except one BO account with the name of his brother*" is misleading and inaccurate. On 08 November 2021, I was asked to list the BO accounts in my name and in the name of my relatives including my wife. The question did not state that I had to include all closed and inactive accounts in such list. Hence, I misunderstood the question and only mentioned the two existing (active) BO Accounts in my name and stated that one account might be active in the name of my brother Md. Mehedi Hasan since those were the only "active" accounts of my relatives at that time as per my knowledge. My brother Md. Mehedi Hasan manages and operates his own BO accounts by himself, of which I have no knowledge of and I am in no way involved and/or connected in the management of such accounts. I stated in my reply which you have quote that "মোঃ মেহেদি হাসানের নামে একটি BO থাকতে পারে কিন্তু শিওর না।" This clearly shows my lack of knowledge regarding my brother's BO accounts and their share transaction activities. And if I had intended to make false statement to the SEC, I would not have mentioned the possibility of the existence of BO account in my brother's name.



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Furthermore, the accounts in my wife Anjuman Ara's name and my sister Jasmin Akter's were non-existent (already closed) when I was asked about accounts of my relatives. Since the question did not clarify that I had to mention inactive/closed accounts too, I did not understand the question and did not include these accounts in that list. I had no intention to lie or make any untrue, inaccurate and/or misleading statements before the SEC and till now I have fully co-operated with the inquiries of the SEC's good faith.

Additionally the account under the name of Taslima Begum is not in any way related to me as she is not my relative and completely unknown to me. Perhaps the SEC was supplied with deliberate misinformation of that account by some vested quarter to implicate and purposefully harass me.

Furthermore, I apologize if my misunderstanding of your question led me to make incomplete answers. I hope my explanation and my willingness to cooperate with SEC would allow you to realise my sincerity and good intention in this investigation process and as such you are requested to withdraw the allegation against me of violating section 18 of Securities and Exchange Ordinance, 1969.

4. Under the heading "**A. Mr. MOHAMMAD KAMRUL HASAN, CFO OF THE NRB BANK LTD. AND HIS ASSOCIATE:**" in page No. 3 of the Notice it is stated that I am the signatory person and one of the key persons in maintaining NRB Bank Limited's investment fund in the capital market. I have already explained in this reply earlier that, the investment portfolio of NRB Bank Limited in the capital market is maintained by the 6 membered Investment Committee, which took all decisions regarding investment in the capital market. As such I was only a junior member of the Committee who executed the decisions taken by the Committee.

In the second paragraph under the said heading you stated that "*Mr. Kamrul maintains 10(ten) BO account in various TREC Holder Companies and Merchant Banks. Among them he traded the shares of PIONEERINS through 03 (three) BO accounts namely Mohammad Kamrul Hasan, Anjuman Ara (Wife of Mr. Kamrul) and Md. Mehedi Hasan (Brother of Mr. Kamrul)...*". This statement is deliberately misleading and as such refuted by me. I have disclosed to the SEC in my written interview dated 08 November 2021 that I have two BO accounts in my name. I only control and manage these two BO accounts. All the remaining accounts in the name of my brother and wife were managed by them and I had no involvement in their management. Furthermore I would like to add that, the three accounts you have mentioned from which PIONEERINS shares were traded were all done lawfully, following SEC laws and rules and the trade policies of the DSE. Each of the transactions was lawful. No series of trade took place from these accounts and the transactions clearly show a normal pattern of trade. Additionally, in the Appendix 2 of the Notice it is clearly shown that the number of shares traded from my wife Anjuman Ara's BO account and my brother Md. Mehedi Hasan's BO account were very nominal i.e. 17,000 and 2,000 respectively. These transactions do not give rise to any notion of illegality or impropriety. As such these lawful and normal pattern of transaction do not suggest any unlawful activity by me.

5. Under the heading "**4. Comparative Analysis of the Daily Transaction**" the Notice presents the daily trade pattern of NRB Bank Limited and my daily trade patterns between 09.05.2021 and 22.06.2022. These tables present a partial picture of the trades carried out under the instructions of the Investment Committee while I was the CFO of the NRB Bank and the



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

notice does not show the full picture as it omits transactions carried out in significant periods between January 04, 2021 and August 09, 2021. But the Notice focuses only on a limited period. Thereby such analysis of pattern is not a complete analysis of the trade during the time when I was the CFO of NRB Bank Limited. As such this partial analysis do not show the whole picture and thereby it is unfair and prejudicial to me.

I would also like to add that, all trades made on behalf of the NRB Bank Limited on the dates mentioned in the Notice (and on all other days while I was the CFO) the decisions regarding the trade of shares were taken by the Investment Committee under the leadership of its Chairman, i.e. the MD of the NRB Bank Limited. Furthermore, all of the transactions related to the shares in question were done in the share market trades. None of the shares were traded in block trade. As such the shares were traded at rates set by the market and were completely part of the normal transactions of the share market.

In regards to the matter of shares traded by me, the data provided in the said notice shows the rates at which I had traded such shares. The data has many inaccuracies. For example, the data shows that on 17.05.2021 I had traded shares of PIONEERSINS by selling at BDT 108.17, but in reality, I had not traded i.e. neither bought nor sold any shares of PIONEERSINS on that day. Furthermore, regarding all the other dates i.e. 24.05.2021, 30.05.2021, 01.06.2021, 07.06.2021 and 10.06.2021 on which the data purports that I had either bought or sold shares of PIONEERSINS, all the trades were completely lawful and such trades followed the normal market trends. I purchased or sold from the market at market prices. None of the trades were block trades. The buy or sale prices were completely different than the rates at which NRB Bank Limited traded and these rates were in no way connected to each other. These trade patterns do not suggest that I had in any manner manipulated the market or prices or that I had taken undue advantage of my position to make personal gains.

I would also like to add that, the observation made in the page No. 4 of the notice draws completely inaccurate conclusion based on partial and misleading information. The observation shows that the NRB Bank had made a realized loss of BDT. 47,025,982.92. This is completely inaccurate as the realization of this loss did not take place while I was the CFO of the NRB Bank Limited and as such this loss in no way should be attributed to my time as CFO. Additionally the observation completely disregarded the realized gains made by the NRB Bank Limited during this period. It is pertinent here to mention that, between January 04, 2021 and August 09, 2021 the NRB Bank Limited made realized gains of around 20 crore from the trade of PIONEERSINS shares. The SEC may verify such records by calling for the same from the Bank.

6. In page No. 9 of the Notice under the heading "**Observation**" it is stated that I being "*the signatory person/authorized person in investment activities of NRB Bank Limited*" bought PIONEERSINS shares "*with about to highest price*" and sold "*with about to lowest price*" while simultaneously I personally or through my associates' accounts bought at lower price and sold at higher price. This observation is also very misleading. Without drawing any connection between the prices of the share trades and price manipulation, the observations in the Notice are based on speculation and conjectures without any concrete evidence or reasonable reasoning. I would like to reiterate that, all the trades I made or trades made from my relatives' accounts (all of which were managed by the respective relatives themselves and were never managed by me) were lawful trades made following all laws of SEC and trading



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

policies of the DSE. These trades took place in the capital market following the normal pattern of trade. There were no series of trades made from these accounts. As such, the gains and losses made from these accounts followed normal market trends.

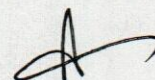
Furthermore, in the table showing comparative realized and unrealized gain/loss of NRB Bank Limited and my tradings, the table shows that I had made a total gain of BDT. 4,488,375.31 (Taka Four Million Four Hundred Eighty Eight Thousand Three Hundred Seventy Five and Thirty One Paisa) only. Such information is incorrect. As of 09.02.2022 (almost two and half months prior to issuing your show cause notice) there was no unrealized gain/loss in my BO Accounts in regards to PIONEERINS shares. The realized loss was BDT.(1,283,662.84) (Taka One Million Two Hundred Eighty Three Thousand Six Hundred Sixty Two and Eighty Four Paisa). (Relevant ledger is annexed as Annexure-1 herewith).

The accounts of realized and unrealized gains of the bank are all partial and misleading, suppressing a lot of vital information. The bank has made realized gains of around 20 crore from the trade of PIONEERINS shares which can be verified by the SEC if the complete ledger of PIONEERINS share of the period while I was the CFO of NRB Bank Limited trade is called for by the SEC. Furthermore, the realized loss of 47,025,982.92 mentioned in the Notice were not realized while I was the CFO of the NRB Bank Limited. As such, any explanation regarding such realized loss should be asked from the concerned members of the Investment Committee when such losses were realized. Therefore, your observation in page No. 10 of the Notice stating ***"Therefore it is evident that Mr. Mohammad Kamrul Hasan and his associates directly or indirectly involved in series of transactions of PIONEERINS which causes of rising of prices of the share and making own profit ignoring that of NRB Bank Limited"*** is completely unsubstantiated, speculative and injudicious. As such I urge you to withdraw such statement. And therefore the ***"Contravention"*** that I along with my associates have violated section 17(e)(v) of Securities and Exchange Ordinance, 1969 (XVII of 1969 by allegedly being involved ***"directly and indirectly in a series of transaction of shares of PIONEERSINS"*** is unsubstantiated and without any merit and as such should be withdrawn.

7. In page No. 10 of the Notice it is observed that NRB Bank Limited and Mr. Sheikh Farook Ahmad were directly or indirectly involved in counterparty transaction of PIONEERSINS shares for a prolonged period leading investors to be involved in the transaction of such shares and causing the rise of the price of the shares.

As stated earlier, all the transactions of PIONEERSINS made by the NRB Bank Limited were made in the capital market at prices set by the market. None of such transactions took place in block trade basis. All transactions of investment portfolio of NRB Bank Limited were made with the decision of the Investment Committee following the NRB Bank Limited's internal policies regarding the prices of share. Irrespective of who the signatory of the transactions was, the decisions should be attributed to the whole committee instead of any single individual. But I am wrongfully being targeted here, while no other committee members are facing any investigation, even though they share higher degree of liabilities for the same share trades.

Additionally I would like to draw your kind attention to some false undertakings taken illegally from me by the top official of the NRB Bank Limited. During my time as the CFO of



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

the NRB Bank Limited, I was coerced into signing false undertakings by that official stating that I was solely responsible for all the investment related decisions. I was threatened with the ruin of my personal reputation and career. I was mentally tortured repeatedly until I signed such false undertakings. Such illegally taken undertakings are not enforceable in the eyes of the law and therefore I should not be held bound by the contents of such illegal undertakings taken under coercion. I have made written complaints to the NRB Bank Limited and the Ministry of Home Affairs in regards to such coerced undertakings.

Furthermore, during transactions in the capital market, it is not possible to know from whom shares are being purchased. As such the "**Contravention**" that me along with Mr. Sheikh Farook Ahmad have violated section 17(a) and 17(e)(v) of the Securities Exchange Ordinance, 1969 by being involved "*directly and indirectly in a series of transactions of PIONEERINS in order to create the appearance of active trading of the said share and involving in counter party transaction at the negotiable prices and a deal basis as a fraud upon NRB Bank Limited*" is completely baseless and meritless and therefore should be withdrawn.

Finally, I would like to add that, I have had a 20 years long career in the banking sector where I have performed different duties for different banks, all of which have held me in a very high regard for my honesty, integrity, dedication and hard work. In this long career I have never been accused of any wrongdoings by any of my former employers. My spotless record of employment speaks for itself. Even after being employed by the NRB Bank Limited, no objections were raised against me before my sudden and unexpected withdrawal from my post as CFO. Even though I was employed by the NRB Bank Limited for a relatively short period, my entire career is now in jeopardy. As a junior member of the Investment Committee of the NRB Bank Limited, my sole job was to execute/implement the decisions taken by the Committee. Although I dutifully carried out such instructions, now I am facing absurd and unsubstantiated allegations which are designed with the sole purpose of destroying my career. I have yet to receive justice from the internal proceedings of the NRB Bank Limited. Now I face these allegations mentioned in the Show Cause Notice stated above. All the allegations made in the notice are without an iota of evidence and based on mere conjecture and speculation.

I am confident that, if my reply is correctly evaluated and further investigation is carried out based on it, more facts will be revealed which will certainly exonerate me. I am respectful to the investigation process of the Bangladesh Securities and Exchange Commission and as such am prepared to continue my full cooperation in this process. I therefore, pray and hope that you will consider my reply with due sincerity and consider the facts and circumstances of the allegations. I hereby urge you to accept this reply to the "Show cause cum notice for hearing: Non-compliance securities related laws" dated April 27, 2022 and deduce that all the allegations against me are unsubstantiated, malicious, manufactured and thereby declare my innocence in regards to such claims and oblige me thereby."



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

যেহেতু, Mr. Mohammad Kamrul Haasan-এর উল্লিখিত বক্তব্য এবং অনুসন্ধান প্রতিবেদন থেকে প্রতীয়মান হয় যে, তাঁর বিরুদ্ধে উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকাণ্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mr. Mohammad Kamrul Haasan-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Mohammad Kamrul Haasan উপর্যুক্ত কর্মকাণ্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(a) ও Section 17(e)(v) লংঘন করেছেন;

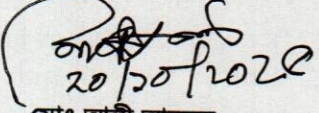
যেহেতু, Mr. Mohammad Kamrul Haasan-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Mohammad Kamrul Haasan-কে অর্থদণ্ডে দণ্ডিত 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. Mohammad Kamrul Haasan-কে শেয়ার লেনদেনে কারসাজি করে Securities and Exchange Ordinance, 1969 এর Section 17(a) ও Section 17(e)(v) ভঙ্গের দায়ে যথাক্রমে ২৫.০০ (পঁচিশ) লক্ষ এবং ৫০.০০ (পঞ্চাশ) লক্ষ টাকা, সর্বমোট ৭৫.০০ (পঁচাত্তর) লক্ষ টাকা অর্থদণ্ডে 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 সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


২০/১০/২০২০
মোঃ আলী আকবর
কমিশনার

বিতরণ:

- ১। Mr. Mohammad Kamrul Hasan
(BO ID: 1602770067892350)
House No. 14/Kha, Flat # 5-A,
Shahjampur, Gulshan -2, Dhaka- 1212.
Mobile: 01714086148

A. Counter-party transaction between NRB Bank Limited and Mr. Sheikh Farook Ahmad:

After analyzing the DSE Trade Data, it was observed that NRB Bank Limited and Mr. Sheikh Farook Ahmad directly or indirectly involved in counterparty transaction of PIONEERINS share for a long time which may induce the investors to involve in the transaction of PIONEERINS and causes of raising the price of the share. Details are given below:

TRADE DATE	TRADE TIME	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	SELLER CODE	SELLER CLIENT
30/05/2021	13:22:22	PIONEERINS	927900	147.9	DSECB	C199	DSELRK	43999
30/05/2021	13:22:28	PIONEERINS	115774	147.9	DSECB	C199	DSELRK	43999
30/05/2021	13:23:24	PIONEERINS	752700	147.8	DSECB	C199	DSELRK	44422
30/05/2021	13:23:51	PIONEERINS	26726	147.8	DSECB	C199	DSELRK	44422
30/05/2021	13:37:47	PIONEERINS	21000	138.9	DSEDBS	8989	DSELRK	44422
01/06/2021	12:37:47	PIONEERINS	1191641	151.8	DSEDBS	8989	DSELRK	43999
01/06/2021	12:38:51	PIONEERINS	259675	150.7	DSEISL	C109	DSELRK	44422
01/06/2021	12:39:03	PIONEERINS	98840	150.7	DSEISL	C109	DSELRK	43999
07/06/2021	14:16:17	PIONEERINS	100000	166	DSECB	C199	DSELRK	43999
07/06/2021	14:16:17	PIONEERINS	70192	166	DSECB	C199	DSELRK	43999
07/06/2021	14:19:04	PIONEERINS	100000	165.8	DSEISL	C109	DSELRK	43999
07/06/2021	14:19:04	PIONEERINS	100000	165.8	DSEISL	C109	DSELRK	43999
07/06/2021	14:19:04	PIONEERINS	100000	165.8	DSEISL	C109	DSELRK	43999
07/06/2021	14:19:04	PIONEERINS	67540	165.8	DSEISL	C109	DSELRK	43999
07/06/2021	14:21:26	PIONEERINS	32460	165.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:21:26	PIONEERINS	67540	165.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:22:32	PIONEERINS	32460	165.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	308	166	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	100000	166.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	100000	166.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	100000	166.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	100000	166.8	DSEDBS	8989	DSELRK	43999
07/06/2021	14:23:24	PIONEERINS	96892	166.8	DSEDBS	8989	DSELRK	43999
08/06/2021	14:03:39	PIONEERINS	24664	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:03:39	PIONEERINS	30000	179	DSEDBS	1975	DSECB	C199
08/06/2021	14:04:10	PIONEERINS	100000	179.1	DSELRK	43999	DSECB	C199
09/06/2021	14:04:17	PIONEERINS	666790	198.3	DSEDBS	8989	DSELRK	44422

10/06/2021	11:49:52	PIONEERINS	100	194.9	DSELRK	43999	DSEATI	C201
10/06/2021	11:50:04	PIONEERINS	100	194.9	DSELRK	43999	DSEATI	C201
10/06/2021	11:50:12	PIONEERINS	1300	194.9	DSELRK	43999	DSEATI	C201
10/06/2021	11:53:49	PIONEERINS	799	192.3	DSELRK	43999	DSEATI	C201
10/06/2021	11:54:23	PIONEERINS	360	194.6	DSELRK	43999	DSEATI	C201
10/06/2021	11:54:29	PIONEERINS	100	194.5	DSELRK	43999	DSEATI	C201
10/06/2021	11:54:40	PIONEERINS	540	194.5	DSELRK	43999	DSEATI	C201
10/06/2021	11:55:52	PIONEERINS	701	192	DSELRK	43999	DSEATI	C201
10/06/2021	12:00:12	PIONEERINS	700	192	DSELRK	43999	DSEATI	C201
10/06/2021	13:56:29	PIONEERINS	195	189.6	DSEDBS	1975	DSEADF	C2026
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	50000	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:23:19	PIONEERINS	47289	196.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:27:55	PIONEERINS	466	196.8	DSEDBS	8989	DSELRK	43999
10/06/2021	14:37:23	PIONEERINS	4419	193.9	DSEISL	C109	DSELRK	43999
10/06/2021	14:37:23	PIONEERINS	500000	193.9	DSEISL	C109	DSELRK	44422
10/06/2021	14:37:23	PIONEERINS	1581	193.9	DSEISL	C109	DSELRK	43999
10/06/2021	14:42:59	PIONEERINS	33500	193.9	DSEDBS	8989	DSELRK	43999
10/06/2021	14:44:42	PIONEERINS	20000	193.9	DSEDBS	8989	DSELRK	43999
13/06/2021	14:29:47	PIONEERINS	150000	188	DSELRK	44411	DSELRK	43999
14/06/2021	10:14:36	PIONEERINS	180	210	DSECBL	C199	DSEEBB	43999
14/06/2021	10:14:39	PIONEERINS	20	210	DSECBL	C199	DSEEBB	43999
14/06/2021	10:14:46	PIONEERINS	200	210	DSECBL	C199	DSEEBB	43999
14/06/2021	10:14:46	PIONEERINS	70	210	DSECBL	C199	DSEEBB	43999
14/06/2021	10:15:08	PIONEERINS	130	210	DSECBL	C199	DSEEBB	43999
14/06/2021	10:15:35	PIONEERINS	180	209.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:17:15	PIONEERINS	50	209.7	DSECBL	C199	DSEEBB	43999
14/06/2021	10:17:15	PIONEERINS	50	209.7	DSECBL	C199	DSEEBB	43999
14/06/2021	10:18:49	PIONEERINS	100	211.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:18:52	PIONEERINS	100	211.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:18:54	PIONEERINS	100	211.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:18:57	PIONEERINS	100	211.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:29:15	PIONEERINS	100	207.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:36:12	PIONEERINS	50	208.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:51:08	PIONEERINS	50	207.9	DSECBL	C199	DSEEBB	43999
14/06/2021	10:51:12	PIONEERINS	50	207.9	DSECBL	C199	DSEEBB	43999
14/06/2021	12:16:30	PIONEERINS	100	209	DSECBL	C199	DSEEBB	43999
14/06/2021	12:16:30	PIONEERINS	100	209	DSECBL	C199	DSEEBB	43999

[illegible]

[illegible]

14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	6530	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	6530	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	6530	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	6530	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	6530	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:18:06	PIONEERINS	23470	209.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	8700	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	10000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	1300	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	8700	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	10000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	1300	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	8700	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	10000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	1300	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	8700	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:23	PIONEERINS	10000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:44	PIONEERINS	17700	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:44	PIONEERINS	20000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:44	PIONEERINS	20000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:29:44	PIONEERINS	20000	208.7	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	11500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	12000	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	6500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	5500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	12000	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	12000	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	11500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	12000	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	6500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	5500	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:42	PIONEERINS	4000	209.2	DSECBL	C199	DSEEB	43999
14/06/2021	12:32:58	PIONEERINS	12000	209.2	DSECBL	C199	DSEEB	43999

14/06/2021	12:32:58	PIONEERINS	8500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	3500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	2500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	9500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	8500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	3500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:32:58	PIONEERINS	4000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	10500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	1500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	4500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	7500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	10500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	1500	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	12000	209.2	DSECBL	C199	DSEEBBS	43999
14/06/2021	12:33:18	PIONEERINS	4000	209.2	DSECBL	C199	DSEEBBS	43999
15/06/2021	10:40:16	PIONEERINS	24600	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	400	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	23700	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	1300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	22900	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	2100	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	22100	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	2900	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	21300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	3700	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20500	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	4500	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	4700	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	4700	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	4700	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20300	212.9	DSECBL	C199	DSEEBBS	44422
15/06/2021	10:40:16	PIONEERINS	20300	212.9	DSECBL	C199	DSEEBBS	44422

15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	10:41:31	PIONEERINS	12000	212.8	DSECB	C199	DSEEB	44422
15/06/2021	13:29:13	PIONEERINS	90000	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:13	PIONEERINS	90000	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:13	PIONEERINS	90000	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:13	PIONEERINS	28980	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:24	PIONEERINS	61020	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:24	PIONEERINS	90000	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:24	PIONEERINS	90000	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:24	PIONEERINS	50080	205.4	DSEEB	43999	DSECB	C201
15/06/2021	13:29:56	PIONEERINS	29920	206.1	DSEEB	43999	DSECB	C201
15/06/2021	13:29:56	PIONEERINS	90000	206.1	DSEEB	43999	DSECB	C201
15/06/2021	13:29:56	PIONEERINS	90000	206.1	DSEEB	43999	DSECB	C201
15/06/2021	13:29:56	PIONEERINS	36840	206.1	DSEEB	43999	DSECB	C201
15/06/2021	13:34:33	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:33	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:33	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:33	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:33	PIONEERINS	2767	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:52	PIONEERINS	7233	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:52	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:34:52	PIONEERINS	2767	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	7233	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	5000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	5000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	10000	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	13:36:05	PIONEERINS	3267	209.8	DSEDB	8989	DSEEB	44422
15/06/2021	14:22:28	PIONEERINS	2547	207.8	DSEDB	8989	DSEEB	44422
15/06/2021	14:22:28	PIONEERINS	3663	207.8	DSEDB	8989	DSEEB	44422
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEB	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEB	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEB	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEB	43999

16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	49000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	1000	208.9	DSEISL	C109	DSEEBBS	43999
16/06/2021	10:56:48	PIONEERINS	39000	208.9	DSEISL	C109	DSEEBBS	43999
17/06/2021	10:04:41	PIONEERINS	500	212	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:05:02	PIONEERINS	500	212	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:05:02	PIONEERINS	460	212	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:05:49	PIONEERINS	110	209.9	DSEEBBS	44411	DSEEBBS	43999
17/06/2021	10:05:58	PIONEERINS	313	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:04	PIONEERINS	77	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:09	PIONEERINS	500	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:14	PIONEERINS	500	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:23	PIONEERINS	497	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:23	PIONEERINS	103	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:32	PIONEERINS	297	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:32	PIONEERINS	153	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:48	PIONEERINS	347	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:48	PIONEERINS	253	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:06:54	PIONEERINS	247	209.9	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2500	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:38	PIONEERINS	2400	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:07:50	PIONEERINS	100	209.8	DSEDBS	8989	DSEEBBS	43999
17/06/2021	10:09:07	PIONEERINS	500	209	DSEDBS	8989	DSEEBBS	43999

[illegible]

A handwritten signature in dark ink, appearing to be "Ad".

[illegible]

16/06/2021	11:57:56	PIONEERINS	3000	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	500	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	25000	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	500	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	1000	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	24000	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	500	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	5500	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	11:57:56	PIONEERINS	15000	200.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	234	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	28000	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	500	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	21148	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	6852	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	500	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	28000	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	14648	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	13352	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	28000	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	8648	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	19352	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	28000	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	2648	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	25352	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	24648	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	3352	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:02:46	PIONEERINS	21648	201	DSEEBBS	44422	DSECBL	C199
17/06/2021	12:51:34	PIONEERINS	500	206	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	12:51:42	PIONEERINS	500	206	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:04:38	PIONEERINS	1400	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	2500	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	2500	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	2500	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	2500	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	2500	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:04:38	PIONEERINS	5000	206.9	DSEEBBS	44422	DSECBL	C199

17/06/2021	13:04:38	PIONEERINS	3100	206.9	DSEEBBS	44422	DSECBL	C199
17/06/2021	13:10:12	PIONEERINS	198	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:10:12	PIONEERINS	500	208	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	59	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	500	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	93	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	308	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	500	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	500	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:41:53	PIONEERINS	500	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	13:42:46	PIONEERINS	2047	207.2	DSEEBBS	44422	DSEEBBS	43999
17/06/2021	14:19:05	PIONEERINS	13916	203.3	DSEDBS	8989	DSEEBBS	43999
17/06/2021	14:29:48	PIONEERINS	3775	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	10000	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	1125	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	8875	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	6125	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	3875	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	10000	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	1125	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	8875	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	6125	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	3875	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	10000	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	1125	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	8875	200.3	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	548	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	1952	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	1548	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	952	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199
17/06/2021	14:29:48	PIONEERINS	2500	200.1	DSEEBBS	44422	DSECBL	C199

20/06/2021	10:10:15	PIONEERINS	25000	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	100	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24900	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	200	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24800	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	300	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24700	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	400	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24600	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	500	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24500	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	600	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24400	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	700	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24300	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	800	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24200	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	900	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	10:10:15	PIONEERINS	24100	200.9	DSEEBBS	43999	DSECBL	C199
20/06/2021	12:09:26	PIONEERINS	225	185.9	DSEEBBS	43999	DSEEBBS	44411
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	48600	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:06:15	PIONEERINS	1400	199.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:11:29	PIONEERINS	39900	197.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:11:29	PIONEERINS	10100	197.7	DSEDBS	8989	DSEEBBS	43999
20/06/2021	13:11:29	PIONEERINS	29900	197.7	DSEDBS	8989	DSEEBBS	43999

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[illegible]

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14/06/2021	14:29:31	PIONEERINS	10000	172	DSEEB	44422	DSECB	C201
14/06/2021	14:29:31	PIONEERINS	10000	172	DSEEB	44422	DSECB	C201
14/06/2021	14:29:31	PIONEERINS	10000	172	DSEEB	44422	DSECB	C201
14/06/2021	14:29:34	PIONEERINS	100000	172	DSEEB	44422	DSECB	C201
22/06/2021	14:33:17	PIONEERINS	73000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:33:41	PIONEERINS	100	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:34:00	PIONEERINS	545	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:34:14	PIONEERINS	4881	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:34:35	PIONEERINS	100	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:35:06	PIONEERINS	25000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:36:44	PIONEERINS	24900	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:40:44	PIONEERINS	5000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:41:09	PIONEERINS	1000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:41:30	PIONEERINS	2000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:43:25	PIONEERINS	2000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:43:25	PIONEERINS	3000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:43:39	PIONEERINS	1200	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:44:10	PIONEERINS	1000	182.3	DSEEB	43999	DSECB	C201
22/06/2021	14:44:55	PIONEERINS	1000	182.3	DSEEB	43999	DSECB	C201
29/07/2021	10:27:12	PIONEERINS	50	138.1	DSEDB	1975	DSECB	C199
29/07/2021	10:27:12	PIONEERINS	50	138.1	DSEDB	1975	DSECB	C199
29/07/2021	10:27:18	PIONEERINS	200	138	DSEDB	1975	DSECB	C199
29/07/2021	10:27:18	PIONEERINS	343	138	DSEDB	1975	DSECB	C199
29/07/2021	10:27:18	PIONEERINS	50	138	DSEDB	1975	DSECB	C199
29/07/2021	10:27:18	PIONEERINS	10	138	DSEDB	1975	DSECB	C199
29/07/2021	10:27:52	PIONEERINS	200	137.6	DSEDB	1975	DSECB	C199
29/07/2021	10:27:52	PIONEERINS	150	137.6	DSEDB	1975	DSECB	C199
29/07/2021	10:27:52	PIONEERINS	200	137.6	DSEDB	1975	DSECB	C199
29/07/2021	10:31:36	PIONEERINS	600	137.1	DSEDB	1975	DSECB	C199
29/07/2021	10:31:43	PIONEERINS	100	137.1	DSEDB	1975	DSECB	C199
29/07/2021	10:31:49	PIONEERINS	100	137.1	DSEDB	1975	DSECB	C199
29/07/2021	10:31:53	PIONEERINS	500	137.1	DSEDB	1975	DSECB	C199
29/07/2021	10:36:27	PIONEERINS	60	137.6	DSEDB	1975	DSECB	C199
29/07/2021	10:37:02	PIONEERINS	100	137.6	DSEDB	1975	DSECB	C199
29/07/2021	10:37:25	PIONEERINS	150	137.6	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	74	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	426	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDB	1975	DSECB	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDB	1975	DSECB	C199

29/07/2021	11:12:32	PIONEERINS	74	136.9	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:32	PIONEERINS	426	136.9	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:32	PIONEERINS	500	136.9	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	474	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	26	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	474	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	26	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:37	PIONEERINS	500	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:44	PIONEERINS	324	136.6	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:44	PIONEERINS	176	136.6	DSEDBS	1975	DSECBL	C199
29/07/2021	11:12:44	PIONEERINS	1000	136.6	DSEDBS	1975	DSECBL	C199
29/07/2021	11:22:59	PIONEERINS	619	137.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:23:12	PIONEERINS	500	137.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:06	PIONEERINS	200	137.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:31	PIONEERINS	1000	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:39	PIONEERINS	930	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:50	PIONEERINS	70	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:50	PIONEERINS	930	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:56	PIONEERINS	70	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:56	PIONEERINS	1000	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:24:56	PIONEERINS	930	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:05	PIONEERINS	70	136.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:10	PIONEERINS	425	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:10	PIONEERINS	500	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:10	PIONEERINS	490	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:22	PIONEERINS	10	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:28	PIONEERINS	500	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:31	PIONEERINS	500	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:34	PIONEERINS	500	136.2	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:37	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:37	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:40	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:44	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199

29/07/2021	11:25:47	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:51	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:54	PIONEERINS	800	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:25:58	PIONEERINS	200	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:26:01	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:26:09	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:26:16	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:26:20	PIONEERINS	1000	136.1	DSEDBS	1975	DSECBL	C199
29/07/2021	11:40:39	PIONEERINS	700	137.3	DSEDBS	1975	DSECBL	C199
29/07/2021	11:46:28	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:46:36	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:47:13	PIONEERINS	100	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:47:19	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:47:26	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:47:36	PIONEERINS	100	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:47:44	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:48:36	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:49:41	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:50:58	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:04	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:09	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:19	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:25	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:31	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:38	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:51:59	PIONEERINS	50	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:05	PIONEERINS	60	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:11	PIONEERINS	15	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:19	PIONEERINS	25	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:43	PIONEERINS	10	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:49	PIONEERINS	10	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:52:57	PIONEERINS	10	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:53:06	PIONEERINS	10	136.8	DSEDBS	1975	DSECBL	C199
29/07/2021	11:53:17	PIONEERINS	10	136.8	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	95	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:39:24	PIONEERINS	150	133.1	DSEDBS	1975	DSECBL	C199
02/08/2021	11:40:25	PIONEERINS	5000	131.1	DSEDBS	1975	DSECBL	C199

1/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	23	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	177	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989
31/08/2021	14:29:28	PIONEERINS	200	142.7	DSEDBS	1975	DSEDBS	8989

