

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২২৮

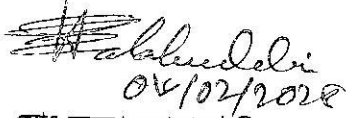
তারিখঃ ফেব্রুয়ারি ০৬, ২০২৫

Ms. Sultana Parvin
(BOID: 1203510068907832)
178 E, 9/4, South Banasri
Mingraon, Dhaka-1219.

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২২৭ তারিখঃ ফেব্রুয়ারি ০২, ২০২৫ এর সত্যায়িত অনুলিপি
আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


04/02/2025

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- ssuddin@sec.gov.bd

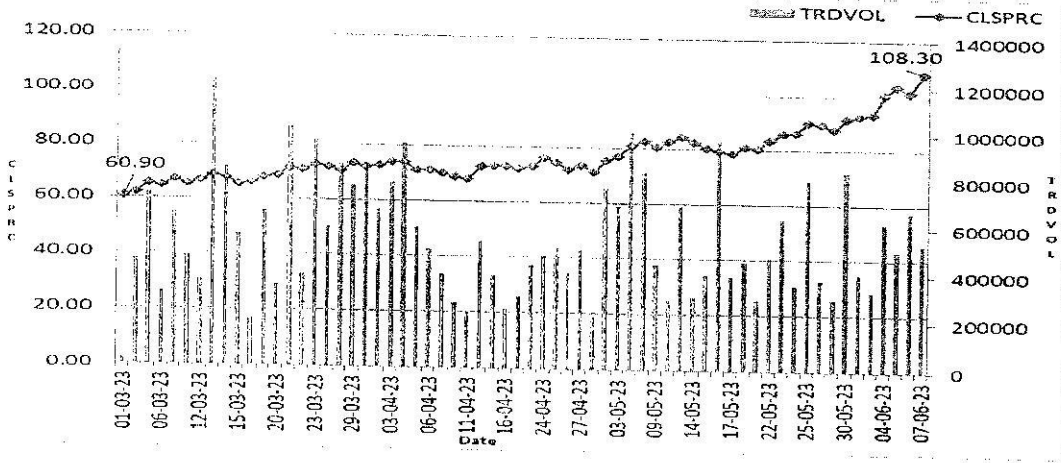
অবগতির জন্য অনুলিপি:

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, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2003-0097]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

আদেশ

যেহেতু, Securities and Exchange Ordinance, 1987 এর Section 2 (3), বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত; যেহেতু, জুন ১১, ২০২৩ তারিখের DSE Surveillance Note # 42/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (DSE) and FINEFOODS Limited, 11/06/2023 এর ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০২.০৩.২০২৩ থেকে ০৭.০৬.২০২৩ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Trends of closing price and trade volume OF "FINEFOODS" in public market



Yesterday Closing Price (YCP) of the share of FINE FOODS LIMITED as on 02-03-2023 was Tk. 60.90 and closing price of the same was Tk. 108.30 as on 07-06-2023. During this period from 02-03-2023 to 07-06-2023, price of the share of FINE FOODS LIMITED was increased by Tk. 47.40 which is approximately 77.83% higher compared to closing price of 01-03-2023.

Observations and findings:

A. Trade details of Mohammad Shamsul Alam and associates:

Observation- 1:

Mohammad Shamsul Alam (Client code # 22232 of Stock & Bond Limited) was the 7th top buyer of FINEFOODS share from 02-03-2023 to 07-06-2023. After examining the relevant documents, it was found that the said client was associated with another account(s) from which they traded shares of "FINEFOODS" during the investigation period. Details are as follows:

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BOLID	CLIENT ID	BO_NAME	DP_NAME	BO_FATHER/HUSBAND	BO MOTHER	Remarks
1203510060172076	22222	Mohammad	Stock & Bond			Joint A/C maintained with
1201820068895861	H0344	Arbim Techo Ltd	BRAC EPL Stock Brokerage Limited			Mohammad Shamsul Alam, Director of Arbim Techo Ltd. is the contact person & first applicant of this BOLID
1205720075603052	04008	A A A Agro Enterprise	NLI Securities Limited			Mohammad Shamsul Alam CEO of A A A Agro Enterprise is the contact person & first applicant of this BOLID
1203510066591329	22260	Mohammed Jahangir Alam	Stock & Bond Limited	Md. Abdur Rob	Ambia Khatun	Brother of Mohammad Shamsul Alam, Director of Arbim Techo Ltd
1602170066475452	4733	Sajiya Jasmin	Mercantile Bank Securities Limited	A.B.M Ziya	Rasheda Khanam	Wife of Mohammad Shamsul Alam
1203510068907832	22246	Sultana Parvin	Stock & Bond Limited	Md. Abdur Rob	Ambia Khatun	Sister of Mohammad Shamsul Alam

a) Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by Mohammad Shamsul Alam and associates and gain and loss statement are given below:



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Date	Code #22232				Code #H0344				Code #21260				Code #4733				Code #2224					
	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)		
22-03-2023	12931	61.67	12970	60.33	0	0.00	0	0.00	8200	61.1	8200	59.66	15400	59.66	150	59.00	36591	60.16	36170	60.16	2175876.7	
25-03-2023	7681	65.52	59787	63.05	0	0.00	0	0.00	179746	54.7	179746	54.7	0	0.00	0	62.83	137016	62.83	208596	62.93	13190595.1	
06-03-2023	16611	65.05	12985	64.96	0	0.00	0	0.00	47657	64.2	47657	64.2	0	0.00	0	65.58	114292	65.58	12895	64.96	84352.0	
09-03-2023	41300	66.05	64024	66.00	0	0.00	0	0.00	50050	65.5	50050	65.5	0	0.00	0	66.76	124584	66.76	88555	65.95	6490332.2	
06-03-2023	50885	65.76	15168	68.72	0	0.00	0	0.00	38647	65.8	38647	65.8	0	0.00	0	0.00	149504	0.00	63394	66.18	419527.2	
12-03-2023	6961	66.54	40000	66.99	0	0.00	0	0.00	103633	66.9	103633	66.9	0	0.00	0	0.00	53000	0.00	178099	67.34	12100130.0	
13-03-2023	975	67.84	31399	68.54	136079	67.45	146700	67.81	17500	68.2	17500	68.2	0	0.00	0	0.00	149504	0.00	32	10094296.7	354747.2	
14-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	70034	70.2	70034	70.2	0	0.00	0	0.00	70034	0.00	178099	67.34	12100130.0	
15-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	58053	0.00	52000	68.18	3545566.0	
16-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	57051	73.51	4183705.7	
19-03-2023	5563	66.76	0	0.00	51000	68.30	51500	68.19	500	66.26	500	66.26	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
23-03-2023	0	0.00	32551	72.89	0	0.00	24500	72.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
27-03-2023	0	0.00	19309	73.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
28-03-2023	0	0.00	76371	70.85	29000	71.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
29-03-2023	0	0.00	31107	71.73	171	72.05	20000	73.52	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
30-03-2023	0	0.00	0	0.00	20000	72.26	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
02-04-2023	0	0.00	8854	71.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
03-04-2023	0	0.00	16839	75.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
04-04-2023	0	0.00	0	0.00	40500	74.90	41000	74.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
05-04-2023	0	0.00	43043	72.19	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
06-04-2023	0	0.00	30118	71.77	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
11-04-2023	30649	68.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
12-04-2023	84545	70.63	0	0.00	67305	69.92	68314	70.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
13-04-2023	0	0.00	18194	72.81	0	0.00	0	0.00	29929	72.40	29929	72.40	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
16-04-2023	0	0.00	7000	72.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
17-04-2023	0	0.00	60000	75.14	0	0.00	0	0.00	79329	73.20	79329	73.20	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
25-04-2023	20999	74.90	0	0.00	46230	75.15	102500	75.83	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
02-05-2023	0	0.00	0	0.00	58004	77.16	25000	77.58	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
07-05-2023	0	0.00	0	0.00	13025	81.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
08-05-2023	0	0.00	0	0.00	93114	82.00	93489	81.41	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
09-05-2023	0	0.00	999	80.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
16-05-2023	0	0.00	120000	80.95	90628	82.50	88746	82.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
22-05-2023	0	0.00	11568	82.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
23-05-2023	0	0.00	0	0.00	30000	86.32	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
24-05-2023	0	0.00	0	0.00	15000	86.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
25-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
30-05-2023	0	0.00	0	0.00	500	88.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
01-06-2023	0	0.00	1000	92.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
06-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
07-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0.00
Total	403817	697506	897506	653937	661759	653937	653937	653937	94389	4600	8300	375000	166816	375000	254111	180359	180359	0.00	0.00	0.00	0.00	0.00

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a) Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by Mohammad Shamsul Alam and Associates:

Date	Buy				Cost of shares sold				Stock Position				Market			
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trades at DSE	Mkt Close Price at DSE	Mark Chan	Client by (%)	Client Sale (%)	Client Tr. (%)	
02-03-2023	6591	60.87	2227407.70	35170	61.70	2331542.80	1373730	61.72	847283697.62	444	62.20	2	8	8.14%	16.37	
05-03-2023	277016	62.92	17429131.10	209555	61.90	12974177.26	1441571	61.90	89234516.35	861	65.30	4	16	3.30%	36.48	
06-03-2023	64278	64.42	4140706.90	12365	62.01	805178.52	1492864	62.29	90853470.05	392	67.00	3	12	16.10%	29.18	
07-03-2023	114242	65.97	7536949.70	148555	62.29	9253524.38	1458551	62.29	90853470.05	900	65.30	3	14	11.16%	27.21	
09-03-2023	82912	65.47	5428228.40	63391	62.73	8343254.99	1469655	62.73	92193135.68	598	66.70	2	28	30.00%	58.28	
12-03-2023	124584	65.93	8214356.40	133000	61.17	12040760.68	1428558	61.17	87053394.95	441	68.80	3	11	15.76%	27.21	
13-03-2023	149504	67.52	10094296.70	190955	63.50	7867496.45	1382656	63.50	87053394.95	836	67.70	1	8	13.87%	22.25	
14-03-2023	70034	70.27	4921166.70	115936	63.53	861869.60	1257012	63.53	79852603.95	563	65.40	3	3	24.00%	25.26	
15-03-2023	10000	66.40	664000.00	135644	0.00	0.00	1257012	63.53	79852603.95	244	66.10	1	7	7.60%	16.72	
16-03-2023	58083	68.11	3954414.00	52000	63.73	331847.73	1263077	63.73	80492170.22	678	68.00	1	8	5.85%	45.53	
22-03-2023	0	0.00	0.00	57051	63.73	363573.06	1263077	63.73	80492170.22	880	72.90	1	2	0.00%	0.00%	
27-03-2023	0	0.00	0.00	360511	63.73	22974587.68	845515	63.73	53882845.48	978	74.90	4	0	0.00%	0.00%	
28-03-2023	25000	71.20	1779912.20	368032	64.84	2352323.75	502483	64.84	33159944.02	791	72.10	1	0	45.53%	45.53	
29-03-2023	83339	70.00	5834080.60	347483	64.80	22517556.93	238354	64.80	15444247.70	880	70.70	1	7	0.50%	5.85	
30-03-2023	20000	72.26	1445200.00	0	0.00	0.00	238354	64.80	15444247.70	880	73.50	3	9	39.47%	48.91	
02-04-2023	0	0.00	0.00	8854	65.38	578990.74	249500	65.38	16312766.46	849	72.20	1	2	0.00%	7.36	
03-04-2023	0	0.00	0.00	16839	65.38	1100964.66	432661	65.38	15211802.80	923	74.10	1	0	1.83%	1.83	
04-04-2023	140500	74.76	10503466.00	41000	68.91	2825391.73	342161	68.91	22889376.58	961	74.00	1	0	1.83%	1.82	
05-04-2023	0	0.00	0.00	43043	68.91	2965178.92	289118	68.91	19923697.66	507	71.60	3	14	3.77%	18.88	
06-04-2023	43149	67.94	2931658.10	30118	68.91	2075491.41	253000	68.91	17848306.24	497	71.30	0	0	7.13%	7.13	
11-04-2023	151850	70.31	10676795.00	68314	69.29	4733336.92	302153	69.29	207798664.34	2304	68.20	1	0	6.06%	6.06	
12-04-2023	80929	72.40	5859083.80	0	0.00	0.00	385685	69.29	26723322.43	531	72.80	6	18	0.00%	12.71	
16-04-2023	0	0.00	0.00	18194	69.83	1270438.30	444420	69.83	32582406.23	390	73.20	0	2	0.00%	41.44	
17-04-2023	0	0.00	0.00	86929	69.83	6070019.31	361451	69.83	25241948.61	250	73.20	0	0	2.38%	7.28	
25-04-2023	121034	76.40	9246584.20	60000	71.48	4288507.77	422525	71.48	30400025.55	507	74.70	2	0	28.84%	28.84	
27-04-2023	267229	74.34	19865635.80	102500	72.82	7461149.33	301491	71.88	15440105.74	621	73.70	2	23	11.92%	15.67	
02-05-2023	0	0.00	0.00	43043	73.33	1833199.01	466240	73.33	30900380.50	578	75.60	5	3	19.46%	19.46	
03-05-2023	62004	77.14	4782996.30	25000	74.94	7006317.09	503234	74.94	375231120	771	77.10	1	27	30.48%	37.79	
07-05-2023	63655	76.34	4856991.70	0	0.00	0.00	566849	73.67	4175231120	10950	81.20	5	8	3.24%	11.26	
08-05-2023	113114	81.29	9195424.60	93499	74.93	748359.77	586464	74.93	43946488.71	863	82.80	1	5	0.00%	5.81	
09-05-2023	0	0.00	0.00	999	75.96	3199857.62	254847	75.96	1358608.54	481	80.70	2	0	0.21%	0.21	
16-05-2023	90628	82.69	7485537.20	421246	0.00	0.00	266415	76.01	20249344.54	9800	79.40	1	0	0.00%	52.37	
18-05-2023	11568	77.00	890736.00	0	0.00	0.00	254847	76.01	19370098.19	4667	81.00	2	2	0.00%	2.48	
23-05-2023	30000	86.32	2589538.50	49000	77.09	3777544.43	254847	77.09	48182092.26	4728	83.60	3	0	2.45%	2.45	
25-05-2023	15000	86.80	1302000.00	0	0.00	0.00	250847	77.07	19484092.26	869	86.20	3	3	5.63%	9.08	
25-05-2023	200000	80.00	16000000.00	32000	78.71	2518572.71	418847	78.71	32965819.55	4104	86.50	0	3	0.00%	0.00	
28-05-2023	31000	84.50	2619500.00	0	0.00	0.00	449347	79.12	35629419.55	3089	89.80	4	3	0.00%	3.65	
29-05-2023	500	88.80	44400.00	0	0.00	0.00	449347	79.12	35629419.55	3089	89.80	4	3	0.00%	3.65	
01-06-2023	0	0.00	0.00	1000	79.12	79116.48	449347	79.12	35629419.55	3089	89.80	4	3	0.00%	3.65	
06-06-2023	0	0.00	0.00	142848	79.12	11301488.24	308499	79.12	35629419.55	3089	89.80	4	0	0.00%	0.16	
07-06-2023	25000	93.00	2325000.00	57182	80.16	4581051.90	278347	80.16	21092166.93	5620	101.80	2	0	20.29%	20.29	
				57182	80.16	4581051.90	278347	80.16	21092166.93	5620	106.40	6	4	10.15%	14.51	

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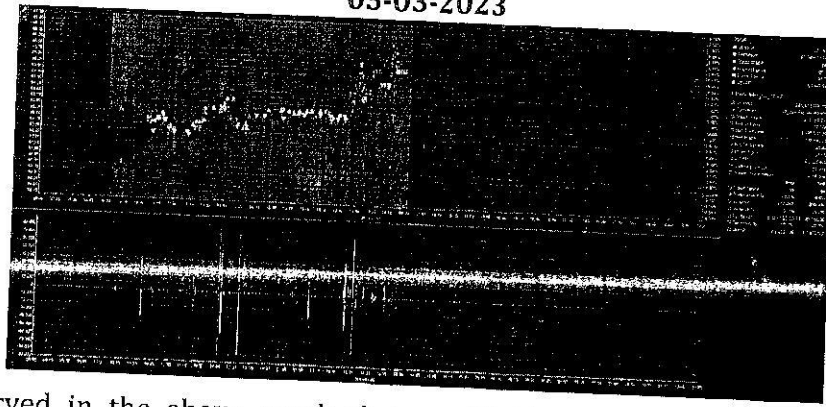
market): Investigation of Mohammad Shamsul Alam and associates (public

The Investigation Team of IED collected Trade monitoring screenshots from the Enforcement Department of BOE on some trading date(s) where appearance or active trading of Mohammad Shamsul Alam and associates were observed which influenced to uplift the price of shares of 'FINEFOODS' during the investigation period.

The details of the graphs are given below:

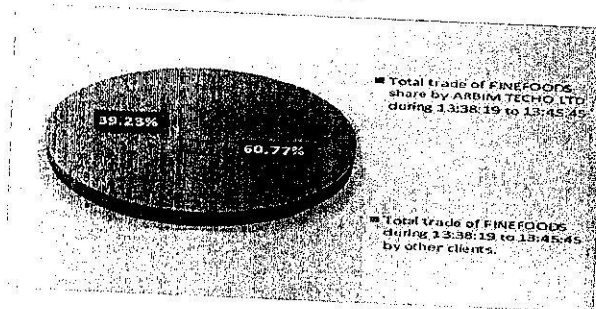
BOLD: 1203510068173076, 1201820068895861, 1205720075603052, 1203510066591329, 1602170066475452, 1203510068907832 (combined)

05-03-2023



It was observed in the above graph that on 05-03-2023, total number of trades of FINEFOODS in the market was 682, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 146 which is approximately 21.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 721,578 whereas buy volume by the said client(s) was 137,016 which is approximately 18.99% of the total traded volume in the market.

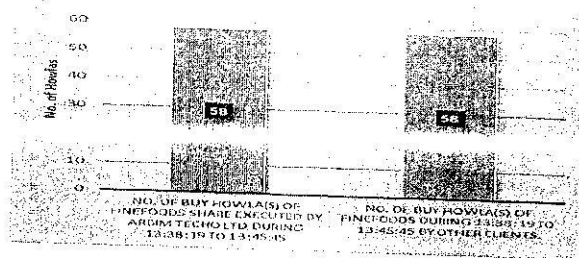
On 05-03-2023, trading of FINEFOODS share was started at Tk. 63.30 which is Tk. 1.10 more than the YCP of Tk. 62.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 13:38:19 at price Tk. 63.50 and induced the same to rise to Tk. 64.80 up to 13:45:45. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates bought 73,352 shares of FINEFOODS compared to the total traded share of 120,709. This is shown in the following Pie Chart.



(Handwritten signature)

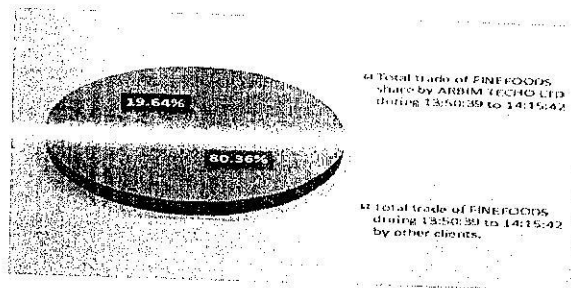
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It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 58 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.

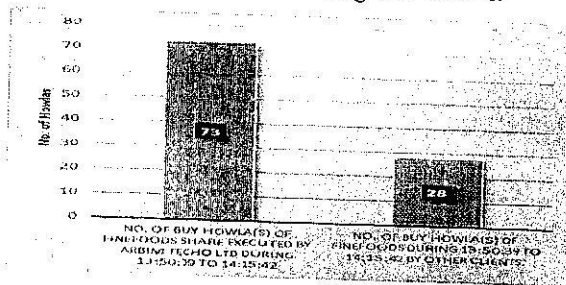


It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 60.77% of the total trades of FINEFOODS shares by executing 58 of total 116 howlas from 13:38:19 to 13:45:45 on 05-03-2023. From 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 63.50 to Tk. 64.80 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share.

Besides, on that day, Mohammad Shamsul Alam and associates started series of trading at 13:50:39 at price Tk. 64.10 and induced the same to rise to Tk. 66.40 up to 14:15:42. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates bought 51,139 shares of FINEFOODS compared to the total traded share of 63,638. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 73 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 101 as shown in the following Bar Chart.

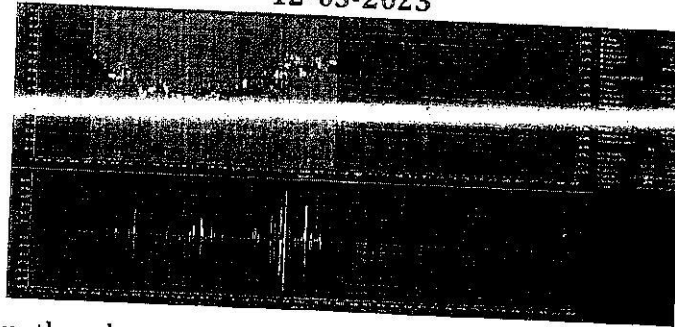


It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 80.36% of the total trades of FINEFOODS shares by executing 73 of total 101 howlas from 13:50:39 to 14:15:42 on 05-03-2023. From 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 64.10 to Tk.

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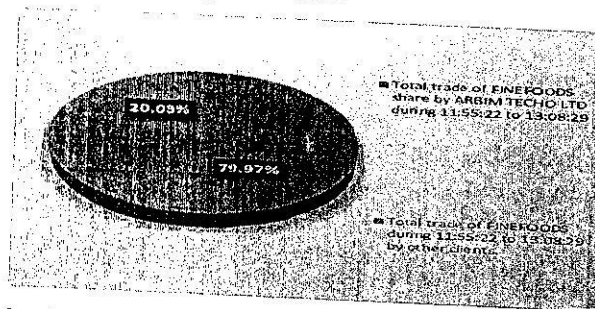
... (price) increased the price by Tk. 2.50. Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 3.10 which is approximately 4.98% higher

12-03-2023



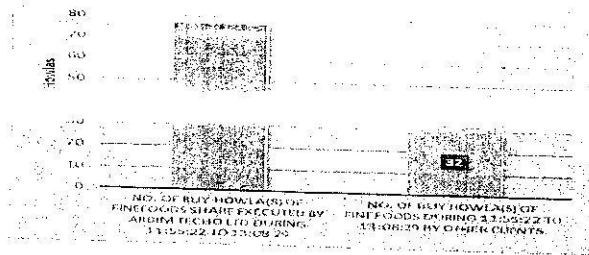
It was observed in the above graph that on 12-03-2023, total number of trades of FINEFOODS in the market was 698, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 202 which is approximately 28.94% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 361,964 whereas buy volume by the said client(s) was 124,584 which is approximately 34.42% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-03-2023 in trading of FINEFOODS share.

On 12-03-2023, trading of FINEFOODS share was started at Tk. 66.80 which is Tk. 1.50 more than the YCP of Tk. 65.30. On that day, Mohammad Shamsul Alam and associates started series of trading at 11:55:22 at price Tk. 64.60 and induced the same to rise to Tk. 65.90 up to 13:08:29. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates bought 50,277 shares of FINEFOODS compared to the total traded share of 62,995. This is shown in the following Pie Chart.



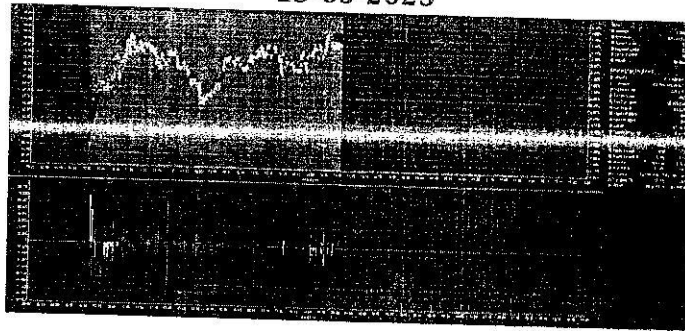
It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 77 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 109 as shown in the following Bar Chart.

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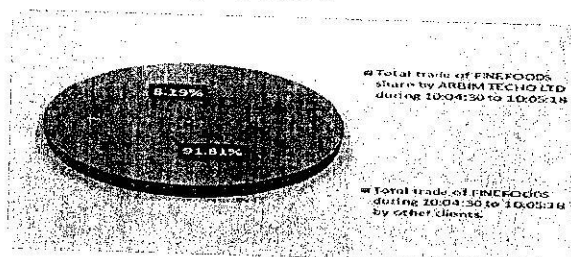
It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 79.97% of the total trades of FINEFOODS shares by executing 77 of total 109 howlas from 11:55:22 to 13:08:29 on 12-03-2023. From 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 64.60 to Tk. 65.90 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.40 which is approximately 2.14% higher than YCP.

13-03-2023



It was observed in the above graph that on 13-03-2023, total number of trades of FINEFOODS in the market was 1841, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates was 160, which is approximately 8.7% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 1,208,313 whereas buy volume by the said client(s) was 149,504 which is approximately 12.37% of the total traded volume in the market.

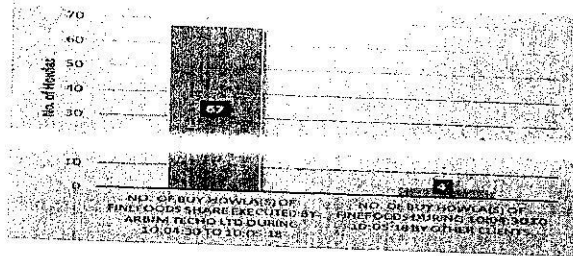
On 13-03-2023, trading of FINEFOODS share was started at Tk. 65.60 which is Tk. 1.10 less than the YCP of Tk. 66.70. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:04:30 at price Tk. 67.30 and induced the same to rise to Tk. 67.70 up to 10:05:18. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates bought 71,722 shares of FINEFOODS compared to the total traded share of 78,122. This is shown in the following Pie Chart.



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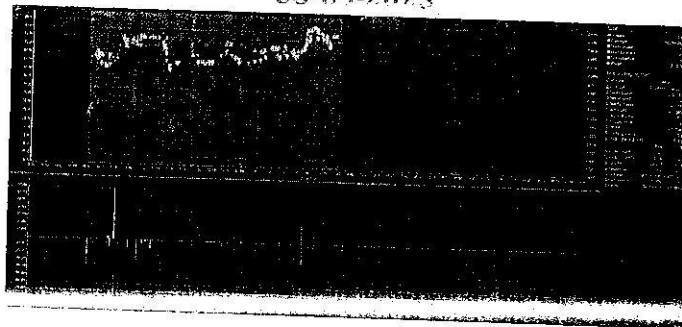
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During the aforementioned period, Mohammad Shamsul Alam and associates executed 67 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 71 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 91.81% of the total trades of FINEFOODS shares by executing 67 of total 71 howlas from 10:04:30 to 10:05:18 on 13-03-2023. From 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 67.30 to Tk. 67.70 (induced the price by Tk. 0.40). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 2.10 which is approximately 3.15% higher than YCP.

08-05-2023

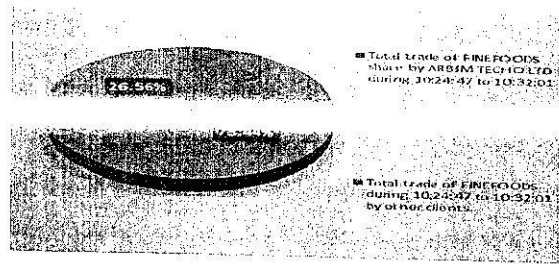


It was observed in the above graph that on 08-05-2023, total number of trades of FINEFOODS in the market was 1112, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 74 which is approximately 6.65% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 831,479 whereas buy volume by the said client(s) was 93,114 which is approximately 11.20% of the total traded volume in the market.

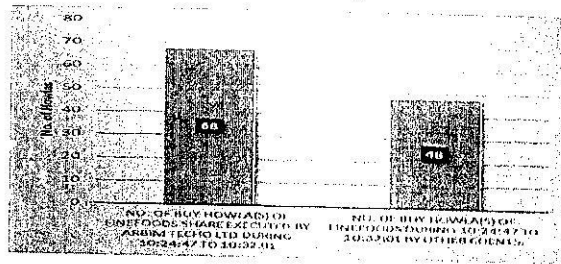
On 08-05-2023, trading of FINEFOODS share was started at Tk. 78.00 which is Tk. 3.20 less than the YCP of Tk. 81.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:24:47 at price Tk. 81.30 and induced the same to rise to Tk. 82.50 up to 10:32:01. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates bought 90,414 shares of FINEFOODS compared to the total traded share of 123,115. This is shown in the following Pie Chart.

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It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 68 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 73.44% of the total trades of FINEFOODS shares by executing 68 of total 116 howlas from 10:24:47 to 10:32:01 on 08-05-2023. From 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 81.30 to Tk. 82.50 (induced the price by Tk. 1.20). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.60 which is approximately 1.97% higher than YCP.

Summary of the trade by Mohammad Shamsul Alam and associates:

Block Buy		Block Sale		Summary												
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Total Buy		Total Sale		Cost of Shares Sold		Stock Position				
						Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
750736	74.05	56334996.00	7E+05	72.45	47287712.10	2,562,695.00	72.13	18484531.30	3,662,078.00	73.56	269391374.90	67.62	247636664.99	274347	80.16	21992161.91

d. Gain and Loss by Mohammad Shamsul Alam and associates from 02.03.2023 to 07.06.2023:

Realized Capital gain(loss)per unit	5.94	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.78%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	21,754,709.91	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (07-06-2023)	108.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	28.14	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	35.10%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	7,719,416.17	Quantity of Stock Position x Unrealized gain (loss) per unit

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Trade Data of Equity Listing of BNP Paribas Global Finance PLC and Associates:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOID SELLER	MARKET TYPE
28-03-23	11:28:32	279959948	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959949	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959950	FINEFOODS	1005	71.5	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
28-03-23	11:28:41	279959975	FINEFOODS	995	71.5	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
16-05-23	12:52:31	283924418	FINEFOODS	158	81	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
16-05-23	12:52:36	283924474	FINEFOODS	1000	81	DSEEPS	HO344	1201820068895861	DSESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963310	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963320	FINEFOODS	1769	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963321	FINEFOODS	231	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963327	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963334	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963340	FINEFOODS	919	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:42:04	279963402	FINEFOODS	1051	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	12:01:23	279967884	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
16-05-23	12:36:59	283915856	FINEFOODS	3211	81.3	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
16-05-23	12:36:59	283915857	FINEFOODS	1789	81.3	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
16-05-23	12:59:29	283928406	FINEFOODS	1900	81.5	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
12-04-23	10:50:05	281119325	FINEFOODS	1000	69.7	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119382	FINEFOODS	1000	69.7	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119383	FINEFOODS	1000	69.7	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119384	FINEFOODS	1000	69.7	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119385	FINEFOODS	900	69.7	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119435	FINEFOODS	900	69.8	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119437	FINEFOODS	100	69.8	DSESBL	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
07-03-23	10:55:21	278779320	FINEFOODS	1000	64.9	DSESBL	22232	1203510068173076	DSESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985394	FINEFOODS	2750	66	DSESBL	22232	1203510068173076	DSESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985395	FINEFOODS	3000	66	DSESBL	22232	1203510068173076	DSESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985396	FINEFOODS	3000	66	DSESBL	22232	1203510068173076	DSESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985397	FINEFOODS	1250	66	DSESBL	22232	1203510068173076	DSESBL	22246	1203510068907832	Public
09-03-23	14:10:07	278976832	FINEFOODS	30000	65	DSESBL	22232	1203510068173076	DSENL	04008	1205720075603052	Public
29-03-23	12:00:47	280044729	FINEFOODS	83168	70	DSESBL	22232	1203510068173076	DSENL	04008	1205720075603052	Block
07-06-23	10:07:08	287291682	FINEFOODS	25000	93	DSESBL	22232	1203510068173076	DSEMBL	4733	1602170066475452	Block
02-03-23	12:29:00	278428191	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428193	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428194	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428195	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428196	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428197	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428198	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428199	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428200	FINEFOODS	1000	59.6	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
07-03-23	12:04:01	278807613	FINEFOODS	1000	65.8	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
07-03-23	12:04:44	278807862	FINEFOODS	1000	65.8	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
07-03-23	12:08:10	278808932	FINEFOODS	800	65.8	DSESBL	22246	1203510068907832	DSESBL	22232	1203510068173076	Public
07-03-23	10:41:47	278771482	FINEFOODS	5000	64.2	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
07-03-23	14:18:55	278870326	FINEFOODS	1796	67.3	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
12-03-23	13:41:37	279065317	FINEFOODS	1750	67	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
12-03-23	13:41:41	279065325	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
12-03-23	13:41:45	279065360	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
12-03-23	13:41:49	279065371	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
13-03-23	13:32:25	279161748	FINEFOODS	10350	68.2	DSENL	04008	1205720075603052	DSESBL	22232	1203510068173076	Public
09-03-23	14:16:32	278982617	FINEFOODS	3000	66	DSENL	04008	1205720075603052	DSESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985899	FINEFOODS	1660	66	DSENL	04008	1205720075603052	DSESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985900	FINEFOODS	3000	66	DSENL	04008	1205720075603052	DSESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985901	FINEFOODS	226	66	DSENL	04008	1205720075603052	DSESBL	22246	1203510068907832	Public

TOTAL HOWLA NO: 58

TOTAL TRADE VOLUME: 237125

(DSE trade data)

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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 carrying 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 or as a deception in relation to securities; or

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

It is found that associates of **Mohammad Shamsul Alam** and associates acted as counter party of each other for **237125** shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period.

Contravention(s)-2:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- Section 17(e)(ii) of Securities and Exchange Ordinance, 1969 by executing trades that created a false and misleading appearance of active trading in securities.

Observation-3:

As per the DSE trade data, it was observed that **Mohammad Shamsul Alam** and associates had collectively acquired more than 10% shares of "FINEFOODS" during the investigation period. Details are given below:

Shareholding position of Mohammad Shamsul Alam and associates:

Sl. No	Client Name	BOID	Name of TREC Holder	Opening Balance	05-03-2023		06-03-2023		07-03-2023		09-03-2023		12-03-2023		13-03-2023	
					Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	ARBIM TECO LTD	1201820068895861	BRAC EPL Stock Brokerage Limited	160000	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	149329	1.07%
2	AAA AGRO ENTERPRISE	1205720075603052	NLI Securities Limited	829154	848898	6.07%	896565	6.42%	896615	6.42%	897262	6.42%	920894	6.59%	920894	6.59%
3	MOHAMMAD SHAMSUL ALAM	1203510068173076	Stock & Bond Limited	260981	308275	2.21%	311901	2.23%	289177	2.07%	324494	2.32%	291455	2.09%	261031	1.87%
4	MOHANMED JAHANGIR ALAM	120351006659029	Stock & Bond Limited	8300	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%
5	SULTANA PARVIN	1203510068907832	Stock & Bond Limited	115295	115677	0.83%	115677	0.83%	104038	0.74%	87592	0.63%	88583	0.63%	88583	0.63%
Total holding of FINEFOODS by the aforesaid clients during the investigation period					1441160	10.31%	1492443	10.58%	1458130	10.43%	1477648	10.57%	1469232	10.51%	1428137	10.22%
Total No. of Outstanding Securities of FINEFOODS				13,973,918												

(DSE Trade data)

From the above table, it is observed that **Mohammad Shamsul Alam** and associates jointly hold more than 10% of the total paid up shares of FINEFOODS.



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Findings-3:

অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮,

“..... (১) বিষয় বা প্রসঙ্গের পরিপন্থী কোন কিছু না থাকিলে, এই বিধিমালায়, (ক) “অধিগ্রহণকারী” অর্থ এমন কোন ব্যক্তি যে নিজে বা অন্য কাহারো সহিত সম্মিলিত হইয়া (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে অধিগ্রহণ করিবার উদ্দেশ্যে অধিগ্রহণকারী হইয়া থাকিলে করে.....”

As per বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

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

However, it is found that **Mohammad Shamsul Alam and associates** jointly hold more than 10% shares of 'FINEFOODS' on the aforesaid dates.

Contravention(s)-3:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), MOHAMMED JAHANGIR ALAM (BOID: 1203510066591329) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of “FINEFOODS” without complying the requirements of the said rules.



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INDIVIDUAL TRADE PATTERN

A. Trade details of SULTANA PARVIN:

Date	Code # 22246				Total					
	BO ID # 1203510068907832									
	SULTANA PARVIN									
	Stock & Bond Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
02-03-2023	15460	59.66	15000	59.00	15460	59.66	922336.90	15000	59.00	885000.00
05-03-2023	191	64.10	39809	62.83	191	64.10	12243.10	39809	62.83	2501233.00
07-03-2023	22892	66.13	34531	65.58	22892	66.13	1513820.20	34531	65.58	2264538.80
09-03-2023	1780	65.51	18226	66.00	1780	65.51	116600.00	18226	66.00	1202916.00
12-03-2023	13991	65.32	13000	66.76	13991	65.32	913896.50	13000	66.76	867844.00
14-03-2023	0	0.00	45936	69.53	0	0.00	0.00	45936	69.53	3193996.00
15-03-2023	0	0.00	43107	66.00	0	0.00	0.00	43107	66.00	2845059.40
16-03-2023	2	66.80	0	0.00	2	66.80	133.60	0	0.00	0.00
04-04-2023	100000	74.70	0	0.00	100000	74.70	7470000.00	0	0.00	0.00
11-04-2023	12500	67.80	0	0.00	12500	67.80	847500.00	0	0.00	0.00
16-05-2023	0	0.00	12500	79.57	0	0.00	0.00	12500	79.57	994639.00
25-05-2023	0	0.00	32000	87.15	0	0.00	0.00	32000	87.15	2788775.00
Total	166816		254111		166816			254111		

Effects of "FINEFOODS" at DSE in both public and block market by SULTANA PARVIN:

Date	Buy			Sale			Cost of shares sold			Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										115295	61.21	7057188.00						
05-03-2023	40191	61.21	2460243.10	39809	62.83	2501233.00	0	61.03	915398.06	115755	61.03	7064126.84	444489	62.20	2.13%	3.48%	3.37%	6.85%
07-03-2023	22892	66.13	1513820.20	34531	65.58	2264538.80	0	61.91	2137709.46	104498	61.91	6469154.18	861578	65.30	4.98%	4.66%	4.62%	9.29%
09-03-2023	1780	65.51	116600.00	18226	66.00	1202916.00	0	61.97	1129414.89	88052	61.97	5456339.29	900524	67.00	3.55%	2.54%	3.83%	6.38%
12-03-2023	13991	65.32	913896.50	13000	66.76	867844.00	0	62.43	811550.67	89043	62.43	5558685.12	558155	65.30	-2.54%	0.32%	3.27%	3.58%
14-03-2023	0	0.00	0.00	45936	69.53	3193996.00	0	62.43	2867645.51	43107	62.43	2691039.60	441964	66.70	2.14%	3.17%	2.94%	6.11%
15-03-2023	0	0.00	0.00	43107	66.00	2845059.40	0	62.43	2691039.60	0	0.00	0.00	836001	67.70	-1.60%	0.00%	5.49%	5.49%
16-03-2023	2	66.80	133.60	0	0.00	0.00	0	0.00	0.00	2	66.80	133.60	563159	65.40	-3.40%	0.00%	7.65%	7.65%
27-03-2023	0	0.00	0.00	2	73.10	146.20	0	66.80	133.60	0	0.00	0.00	244524	66.10	1.07%	0.00%	0.00%	0.00%
04-04-2023	100000	74.70	7470000.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	791884	72.10	-1.10%	0.00%	0.00%	0.00%
11-04-2023	12500	67.80	847500.00	0	0.00	0.00	0	0.00	0.00	100000	74.70	7470000.00	961302	74.00	-0.13%	10.40%	0.00%	10.40%
16-05-2023	0	0.00	0.00	12500	79.57	994639.00	0	73.93	924166.67	112500	73.93	8317500.00	230441	68.20	-1.16%	5.42%	0.00%	5.42%
25-05-2023	0	0.00	0.00	32000	87.15	2788775.00	0	73.93	2365866.67	100000	73.93	7393333.33	980017	79.40	-1.37%	0.00%	1.28%	1.28%
Total	206816	68.88	14244530.30	254111	69.04	17544147.40	0	64.04	16274251.63	68000	73.93	5027466.67	1323154	90.30	4.39%	0.00%	2.42%	2.42%

Summary of the trade by SULTANA PARVIN:

Block Buy		Block Sale		Summary												
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
						Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
100000	61.20	2448000.00	0	0.00	0.00	206816.00	68.88	14244530.30	254111.00	69.04	17544147.40	64.04	16274251.63	68000	73.93	5027466.67

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Realized Capital gain(loss)per unit	5.00	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	7.80%	Gain (loss) Per Unit/Cost Per Unit
Closing Price (07-06-2023)	108.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	34.37	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) TK	2,336,933.33	Quantity of Stock Position x Unrealized gain (loss) per unit

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক সেপ্টেম্বর ১১, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/২৭০১/২০২৪/৭১১ স্মারকমূলে Mohammad Shamsul Alam & associate(s) [associates are Mr. Mohammad Shamsul Alam, Arhim Techo Ltd, A A A Agro Enterprise, Mr. Mohammed Jahangir Alam, Ms. Sajiya Jasmin, Ms. Sultana Parvin]-কে সেপ্টেম্বর ৩০, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখ মার্চ সেপ্টেম্বর ৩০, ২০২৪ এ Ms. Sultana Parvin এর পক্ষে Mr. Mohammad Shamsul Alam শুনানীতে উপস্থিত ৩০.০৯.২০২৪ইং তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

“আপনার প্রেরিত পত্র নাম্বার বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/৭১১ তারিখ: ১১.০৯.২০২৪ সিকিউরিটিজ এন্ড এক্সচেঞ্জ অর্ডিন্যান্স ১৯৬৯-এর ধারা 17(e)(ii), 17(e)(v) আইন এবং বিধি ০৪ (১) বাংলাদেশ সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ লংঘনের অভিযোগে ফাইন ফুডস লিমিটেড-এর শেয়ার লেনদেনের জন্য আগামী ৩০ সেপ্টেম্বর, ২০২৪ইং তারিখে আপনার কমিশনে উপস্থিত হয়ে আমাকে শুনানীর জন্য ডাকা হলে আপনাদের চিঠির মর্মমতে আমার বক্তব্য নিম্নরূপ:

আপনাদের প্রেরিত চিঠিতে রিয়েলাইজড এবং আন রিয়েলাইজড গেইন এর কথা উল্লেখ করেছেন, এ বিষয়ে আমার বক্তব্য হল আমি দীর্ঘদিন যাবৎ শেয়ার বাজারে লেনদেন করে আসছি। শেয়ার ব্যবসায়ী হিসেবে ফাইন ফুডস লি:-এর শেয়ার ক্রয়-বিক্রয়ের মাধ্যমে আমি কিছু মুনাফা রিয়েলাইজড করি এবং বাকী অংশ আনরিয়েলাইজড রয়েছে। আমরা পুঁজিবাজারের বিনিয়োগকারীরা বরাবরই ঝুঁকি নিয়ে বিনিয়োগ করে থাকি। এখানে উল্লেখ্য যে পুঁজিবাজারে আমাদের বিনিয়োগের কোনো অসং উদ্দেশ্য ছিল না এবং আমি/আমরা কোনো ধরনের সিরিজ ট্রানজেকশনের সঙ্গে জড়িত নই। এখানে উল্লেখ্য পরিবারের অন্যান্য সদস্যগণ সম্পূর্ণ আলাদাভাবে বি.ও হিসাব পরিচালনা করা হয়ে থাকে যাহা আমার বা আমার পরিবারের অন্যান্য সদস্যের বিও হিসাব থেকে বুঝা যায়, দিন শেষে আমরা প্রত্যেকেই আমাদের নিজ নিজ পরিবারের আয়ের মাধ্যমে ব্যয়ের পরিচালনা হয়ে থাকে। পুঁজিবাজারের ক্ষতি হয় এমন কোনো কিছুর সঙ্গে আমার কোনো প্রকার কোনো সংশ্লিষ্টতা নেই। আমার সিকিউরিটিজ আইন সম্বন্ধে ভালভাবে ধারণা না থাকার কারণে নিজের এবং পরিবারের সবার ধারণকৃত শেয়ার ১০% এর উপরে হয়ে যাওয়ার কারণে বিএসইসি-এর আইনের ব্যত্যয় ঘটেছে যাহা আমার সিকিউরিটিজ আইন সম্পর্কিত অজ্ঞতার কারণে হয়েছে। বর্ণিত শেয়ারের লেন-দেন এর ক্ষেত্রে এই কোম্পানীর সম্পর্কে আমার কোন ভালো ধারণাও ছিল না, বিষয়টি শুধু আমার অজ্ঞতার কারণে হয়েছে। আরও উল্লেখ্য যে, বর্তমানে আমার আর্থিক অবস্থা খুব শোচনীয় এবং বিভিন্ন ধরনের শারীরিক জটিলতায় ভুগছি। ভবিষ্যতে আমি সিকিউরিটিজ আইন মেনে চলার ব্যাপারে আমি সর্বদা সচেতন থাকব এবং এ ধরনের তুলের পুনরাবৃত্তি যেন না ঘটে তার ব্যাপারে আমি প্রতিশ্রুতিবদ্ধ রইলাম।

অতএব, জনাবের নিকট আমার আবেদন, বর্ণিত বিষয়টি মানবিক কারণে বিবেচনা করে আমার বিরুদ্ধে আনীত সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন অর্ডিন্যান্স ১৯৬৯-এর ধারা 17(e) (ii), 17(e) (v) আইন এবং বিধি ০৪(১) বাংলাদেশ সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ লংঘনের অভিযোগ হতে আমাকে অব্যাহতি প্রদান করতে বিনিতভাবে অনুরোধ করছি।”



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যেহেতু, Ms. Sultana Parvin-এর উল্লিখিত ব্যক্তিগত আর্থদণ্ডে দণ্ডিত করা যাচ্ছে এবং তিনি বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের নিয়ন্ত্রণে থাকা পুঁজিবাজারের সাধারণ বিনিয়োগকারী হিসেবে কাজ করে আসছেন এবং পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Ms. Sultana Parvin-এর ব্যক্তিগত আর্থদণ্ডে দণ্ডিত করা হবে;

যেহেতু, Ms. Sultana Parvin উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ও Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উপস্থাপনা) আইন, ২০১৮ এর অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছেন;

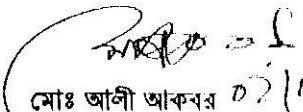
যেহেতু, Ms. Sultana Parvin-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃঙ্খলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Ms. Sultana Parvin-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] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এর অধীন ফরমতাবলে-

- Ms. Sultana Parvin-কে মোট ১১.০০ (এগার) 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 অর্থ প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হ'বে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর ০২/০২/২০২০
কমিশনার

বিতরণ:

১। Ms. Sultana Parvin
(BOID: 1203510068907832)
178 E, 9/4, South Banasri
Khilgaon, Dhaka-1219.