

# Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪১৫/২০২৩/১৬

তারিখঃ জানুয়ারি ০২, ২০২৫

## Nabil Naba Foods Limited

(BO ID # 1204780073985121)

Jui Apartment Complex, House # 13,

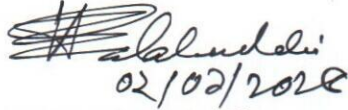
Flat # 4, Road # 17, Block # D,

Banani, Dhaka.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪১৫/২০২৩/১৫ তারিখঃ জানুয়ারি ০২, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

  
02/02/2025

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- [ssuddin@sec.gov.bd](mailto: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/MSI/2022-1099/197 dated February 13, 2023]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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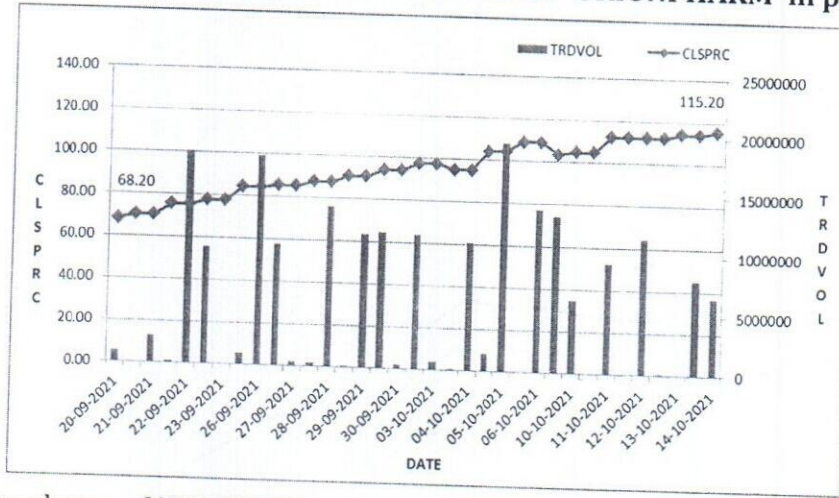
তারিখঃ জানুয়ারি ০২, ২০২৫

**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, অক্টোবর ১৮, ২০২১ তারিখের DSE Surveillance Note # 61/2022 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ২১.০৯.২০২১ থেকে ১৪.১০.২০২১ পর্যন্ত সময়কালে Orion Pharma Ltd. (ORIONPHARM)-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 'ORIONPHARM' in public market**



YCP of the shares of 'ORIONPHARM' as on 21.09.2021 was Tk. 68.20 and closing price of the same was Tk. 115.20 as on 14.10.2021. During this period from 21.09.2021 to 14.10.2021, price of the shares of 'ORIONPHARM' was increased by Tk. 47 which is approximately 68.91% higher compared to closing price as on 20.09.2021

**A. Trading of Md. Aminul Islam and his associates:**

**Observation-1:**

Upon scrutinizing the relevant information and documents, it was observed that *Md. Aminul Islam* (client code # RAJ3245 of ICB Securities Trading Company Limited) and his associates participated in trading of shares of 'ORIONPHARM' during the investigation period in association with 04 (four) BO accounts. The details of the same are delineated as follows:



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Sl. No.	Client's Name	Client Code	BO ID	Name of TREC Holder	Remarks
1	Md. Aminul Islam	RAJ3245	1203100065474357	ICB Securities Trading Co. Ltd.	Individual account of the client
2	Md. Aminul Islam	64400	1204140069187255	Akij Capital Management Limited	
3	Nabil Feed Mills Ltd.	D3366	1204780073851152	United Securities Limited	Md. Aminul Islam is the Managing Director of the company as well as the Authorized Person of the BO account of the company
4	Nabil Naba Foods Limited	D3399	1204780073985121	United Securities Limited	

**Individual trade pattern in public market, Effects of 'ORIONPHARM' in both block and public market, Trade monitoring screenshots and Gain/Loss of Md. Aminul Islam and his associates by trading of 'ORIONPHARM' share are given below:**

**a) Individual Trade pattern of Md. Aminul Islam and his associates in public market:**

Date	Code # RAJ3245				Code # 64400				Code # D3366				Code # D3399				Total							
	BO ID # 1203100065474357				BO ID # 1204140069187255				BO ID # 1204780073851152				BO ID # 1204780073985121											
	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	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total		
	Md. Aminul Islam				Md. Aminul Islam				Nabil Feed Mills Ltd.				Nabil Naba Foods Limited											
	ICB Securities Trading Co. Ltd.				Akij Capital Management Limited				United Securities Limited				United Securities Limited											
21-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100000	69.98	0	0.00	0	0.00	0	0.00	0.00	100000	69.98	6998238.30		
22-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	500000	74.90	0	0.00	500000	75.90	500000	74.04	1000000	75.40	75398609.30	500000	74.04	37022474.10		
23-09-2021	110000	77.90	0	0.00	0	0.00	0	0.00	1000000	78.33	0	0.00	0	0.00	0	0.00	1110000	78.29	86902043.80	0	0.00	0.00		
26-09-2021	250000	80.81	890000	84.10	156000	78.68	0	0.00	0	0.00	0	0.00	0	0.00	212682	77.84	406000	79.99	32476541.20	1102682	82.89	91400521.90		
27-09-2021	0	0.00	110000	86.60	0	0.00	0	0.00	0	0.00	0	0.00	500000	85.92	0	0.00	500000	85.92	42960433.70	110000	86.60	9525477.10		
28-09-2021	460000	85.29	0	0.00	0	0.00	0	0.00	1000000	87.48	1000000	87.10	0	0.00	0	0.00	1460000	86.79	126714687.50	1000000	87.10	87104538.70		
29-09-2021	240000	88.90	137890	90.45	0	0.00	25000	91.00	0	0.00	0	0.00	0	0.00	0	0.00	240000	88.90	21337000.00	162890	90.54	14747654.30		
30-09-2021	250000	92.78	0	0.00	0	0.00	131000	93.00	0	0.00	0	0.00	425000	94.11	316806	93.92	675000	93.62	63191961.80	447806	93.65	41937289.20		
03-10-2021	100180	95.15	0	0.00	0	0.00	0	0.00	30000	95.93	0	0.00	200155	97.05	15512	94.00	330335	96.37	31835387.00	15512	94.00	1458128.00		
04-10-2021	25000	96.00	0	0.00	0	0.00	0	0.00	100000	98.75	309664	97.12	300000	98.83	75000	95.80	425000	98.65	41924580.50	384664	96.86	37258754.00		
05-10-2021	0	0.00	1162290	103.75	0	0.00	0	0.00	0	0.00	690336	103.20	0	0.00	435155	104.30	0	0.00	0.00	2287781	103.69	237219330.10		
06-10-2021	515000	110.70	25000	109.70	0	0.00	0	0.00	1000000	111.96	70000	109.32	200000	112.35	300000	109.92	1715000	111.63	191442103.40	395000	109.80	43370600.70		
07-10-2021	4500	100.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100000	104.26	0	0.00	104500	104.08	10876000.00	0	0.00	0.00		
10-10-2021	0	0.00	0	0.00	0	0.00	0	0.00	40000	107.18	0	0.00	300000	106.93	0	0.00	340000	106.96	36366286.80	0	0.00	0.00		
11-10-2021	0	0.00	0	0.00	0	0.00	0	0.00	100000	109.79	0	0.00	200000	109.81	0	0.00	300000	109.80	32940554.40	0	0.00	0.00		
12-10-2021	0	0.00	0	0.00	0	0.00	0	0.00	200000	112.46	0	0.00	150000	112.20	0	0.00	350000	112.34	39320599.10	0	0.00	0.00		
<b>Total</b>	<b>1954680</b>	<b>2325180</b>	<b>156000</b>	<b>156000</b>	<b>3970000</b>	<b>2170000</b>	<b>2875155</b>	<b>1855155</b>	<b>8955835</b>	<b>6506335</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		





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**b) Effects of 'ORIONPHARM' at DSE (both Public Market and Block Market) by Md. Aminul Islam and his associates:**

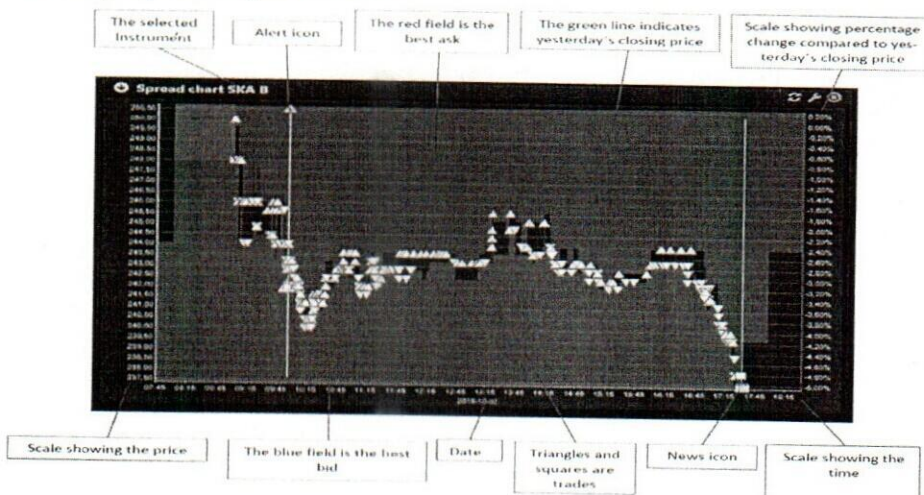
Opening balance: 3,340,000 shares

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6		8	9	10	11	12	13	14	15	16	17	18
Opening Balance										3340000	99.73	333096409.38						
21-09-2021	0	0.00	0.00	100000	69.98	6998238.30	0	99.73	9972946.39	3240000	99.73	323123462.99	2319055	70.20	2.93%	0.00%	4.31%	4.31%
22-09-2021	1000000	75.40	75398609.30	500000	74.04	37022474.10	0	93.99	46995527.39	3740000	93.99	351526544.90	18151390	75.40	7.41%	5.51%	2.75%	8.26%
23-09-2021	1110000	78.29	86902043.80	0	0.00	0.00	0	0.00	0.00	4850000	90.40	438428588.70	9980487	77.60	2.92%	11.12%	0.00%	11.12%
26-09-2021	406000	79.99	32476541.20	1882682	81.02	152535521.90	0	89.59	168676676.52	3373318	89.59	302228453.38	18678170	84.40	8.76%	2.17%	10.08%	12.25%
27-09-2021	500000	85.92	42960433.70	110000	86.60	9525477.10	0	89.12	9803165.55	3763318	89.12	335385721.53	10740269	85.50	1.30%	4.66%	1.02%	5.68%
28-09-2021	1460000	86.79	126714687.50	1000000	87.10	87104538.70	0	88.47	88468748.99	4223318	88.47	373631660.04	13897361	87.60	2.46%	10.51%	7.20%	17.70%
29-09-2021	240000	88.90	21337000.00	162890	90.54	14747654.30	0	88.49	14414488.29	4300428	88.49	380554171.76	11435619	90.70	3.54%	2.10%	1.42%	3.52%
30-09-2021	675000	93.62	63191961.80	447806	93.65	41937289.20	0	89.19	39938711.02	4527622	89.19	403807422.54	11890271	94.00	3.64%	5.68%	3.77%	9.44%
03-10-2021	830335	95.55	79335387.00	45512	90.04	4098128.00	0	90.17	4103951.48	5312445	90.17	479038858.06	12119040	97.60	3.83%	6.85%	0.38%	7.23%
04-10-2021	425000	98.65	41924580.50	384664	96.86	37258754.00	0	90.80	34927721.33	5352781	90.80	486035717.23	10982377	94.90	-2.77%	3.87%	3.50%	7.37%
05-10-2021	0	0.00	0.00	3077781	102.73	316169330.10	0	90.80	279464356.15	2275000	90.80	206571361.07	20807725	104.30	9.91%	0.00%	14.79%	14.79%
06-10-2021	1715000	111.63	191442103.40	425000	109.46	46520600.70	0	99.75	42394917.89	3365000	99.75	335618546.58	13836941	109.00	4.51%	12.39%	3.07%	15.47%
07-10-2021	104500	104.08	10876000.00	0	0.00	0.00	0	0.00	0.00	3669500	99.88	366494546.58	13222533	103.40	-5.14%	0.79%	0.00%	0.79%
10-10-2021	340000	106.96	36366286.80	0	0.00	0.00	0	0.00	0.00	4009500	100.48	402860833.38	6218505	104.70	1.26%	5.47%	0.00%	5.47%
11-10-2021	300000	109.80	32940554.40	0	0.00	0.00	0	0.00	0.00	4309500	101.13	435801387.78	9339662	112.10	7.07%	3.21%	0.00%	3.21%
12-10-2021	350000	112.34	39320599.10	0	0.00	0.00	0	0.00	0.00	4659500	101.97	475121986.88	11546552	112.20	0.09%	3.03%	0.00%	3.03%
<b>Total</b>	<b>9455835</b>	<b>93.19</b>	<b>881186788.50</b>	<b>8136335</b>	<b>92.66</b>	<b>753918006.40</b>	<b>0</b>	<b>90.85</b>	<b>739161211.00</b>	<b>4659500</b>	<b>101.97</b>	<b>475121986.88</b>						

**c) Trade monitoring screenshots of Md. Aminul Islam and his associates (public market):**

The Investigation Team of IED collected Trade monitoring screenshots from the Surveillance Department of DSE on some trading date(s) where appearance of active trading of Md. Aminul Islam and his associates was observed which influenced to uplift the price of shares of 'ORIONPHARM' during the investigation period.

The details of the graphs are given below:



▲ Green triangle represents trade of 'ORIONPHARM' by Md. Aminul Islam and his associates

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

*[Handwritten signature]*



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After scrutinizing the Trade monitoring screenshots collected from Surveillance Department of DSE, it is found that *Md. Aminul Islam and his associates* were involved in trading of shares of 'ORIONPHARM' which influenced to uplift the price of the said securities on several dates:

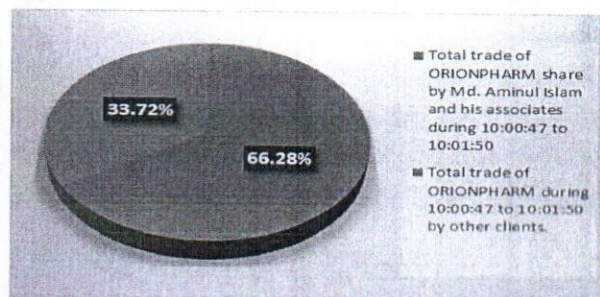
**1203100065474357, 1204780073851152, 1204780073985121 and**  
**1204140069187255 (Combined)**

23-09-2021



It was observed in the above graph that on 23-09-2021, total number of trades of ORIONPHARM in the market was 6344, whereas number of trades (buy) executed by *Md. Aminul Islam and his associates* were 253 which is approximately 3.99% of the total number of trades in the market. Again, total traded volume of ORIONPHARM in the market on that day was 9,961,987 whereas buy volume by the said client(s) was 1,110,000 which is approximately 11.14% of the total traded volume in the market.

On 23-09-2021, trading of ORIONPHARM share was started at Tk. 77.00 which is Tk. 1.60 more than the YCP of Tk. 75.40. On that day, *Md. Aminul Islam and his associates* started series of trading at 10:00:47 at price Tk. 77.00 and induced the same to rise to Tk. 78.90 up to 10:01:50. It can also be observed from the above graph that *Md. Aminul Islam and his associates* executed significant trades during this time period. It is mentionable here that from 10:00:47 to 10:01:50, *Md. Aminul Islam and his associates* bought 500,000 shares of ORIONPHARM compared to the total traded share of 754,373. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, *Md. Aminul Islam and his associates* executed 129 howlas to purchase of shares of ORIONPHARM compared to the total number of howlas of 262 as shown in the following Bar Chart.



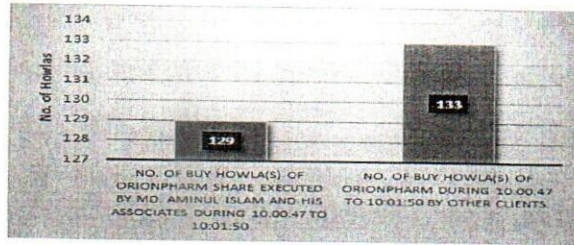
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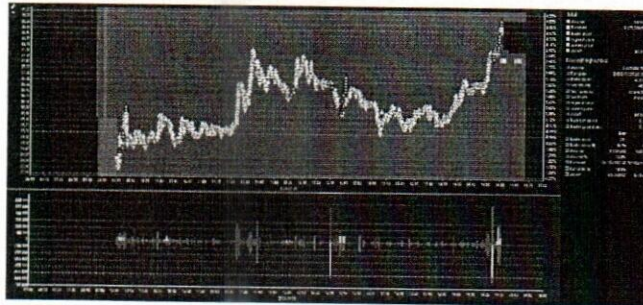
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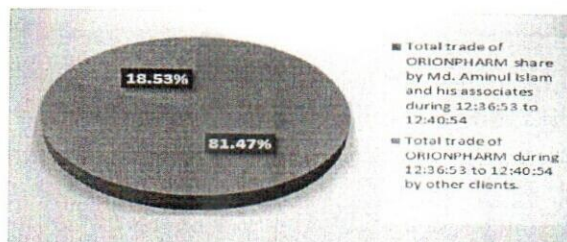
It is observed from the above graphs and screenshot that Md. Aminul Islam and his associates bought 66.28% of the total trades of ORIONPHARM shares by executing 129 of total 262 howlas from 10:00:47 to 10:01:50 on 23-09-2021. From 10:00:47 to 10:01:50, Md. Aminul Islam and his associates induced the price to rise from Tk. 77.00 to Tk. 78.90. Thus it seems that Md. Aminul Islam and his associates were actively trying to lift the price of ORIONPHARM share.

**28-09-2021**



It was observed in the above graph that on 28-09-2021, total number of trades of ORIONPHARM in the market was 6853, whereas number of trades (buy) executed by Md. Aminul Islam and his associates were 417 which is approximately 6.08% of the total number of trades in the market. Again, total traded volume of ORIONPHARM in the market on that day was 13,556,840 whereas buy volume by the said client(s) was 1,460,000 which is approximately 10.77% of the total traded volume in the market.

On 28-09-2021, trading of ORIONPHARM share was started at Tk. 84.10 which is Tk. 1.40 less than the YCP of Tk. 85.50. On that day, Md. Aminul Islam and his associates started series of trading at 12:36:53 at price Tk. 85.80 and induced the same to rise to Tk. 87.00 up to 12:40:54. It can also be observed from the above graph that Md. Aminul Islam and his associates executed significant trades during this time period. It is mentionable here that from 12:36:53 to 12:40:54, Md. Aminul Islam and his associates bought 500,000 shares of ORIONPHARM compared to the total traded share of 613,743. This is shown in the following Pie Chart.





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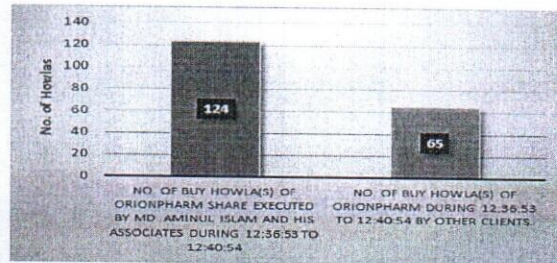
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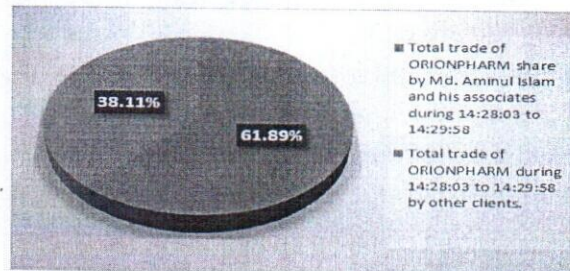
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It is also found that during the aforementioned period, Md. Aminul Islam and his associates executed 124 howlas to purchase of shares of ORIONPHARM compared to the total number of howlas of 189 as shown in the following Bar Chart.

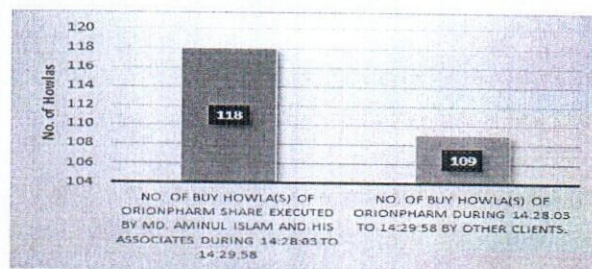


It is observed from the above graphs and screenshot that Md. Aminul Islam and his associates bought 81.47% of the total trades of ORIONPHARM shares by executing 124 of total 189 howlas from 12:36:53 to 12:40:54 on 28-09-2021. From 12:36:53 to 12:40:54, Md. Aminul Islam and his associates induced the price to rise from Tk. 85.80 to Tk. 87.00. Thus it seems that Md. Aminul Islam and his associates were actively trying to lift the price of ORIONPHARM share.

Again, on the same day, Md. Aminul Islam and his associates started series of trading at 14:28:03 at price Tk. 88.00 and induced the same to rise to Tk. 89.00 up to 14:29:58. It can also be observed from the above graph that Md. Aminul Islam and his associates executed significant trades during this time period. It is mentionable here that from 14:28:03 to 14:29:58, Md. Aminul Islam and his associates bought 500,000 shares of ORIONPHARM compared to the total traded share of 807,885. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Aminul Islam and his associates executed 118 howlas to purchase of shares of ORIONPHARM compared to the total number of howlas of 227 as shown in the following Bar Chart.





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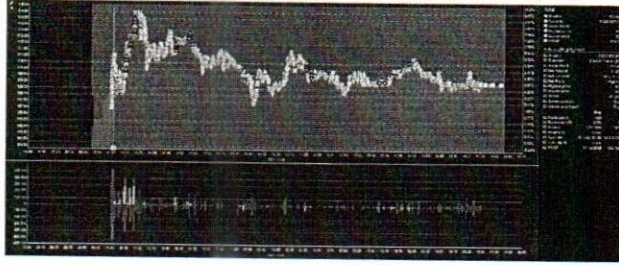
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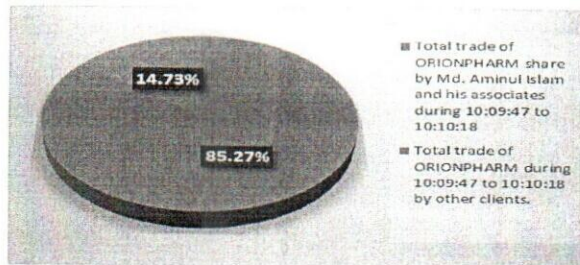
It is observed from the above graphs and screenshot that Md. Aminul Islam and his associates bought 61.89% of the total trades of ORIONPHARM shares by executing 118 of total 227 howlas from 14:28:03 to 14:29:58 on 28-09-2021. From 14:28:03 to 14:29:58, Md. Aminul Islam and his associates induced the price to rise from Tk. 88.00 to Tk. 89.00. Thus it seems that Md. Aminul Islam and his associates were actively trying to lift the price of ORIONPHARM share.

**06-10-2021**



It was observed in the above graph that on 06-10-2021, total number of trades of ORIONPHARM in the market was 8876, whereas number of trades (buy) executed by Md. Aminul Islam and his associates were 484 which is approximately 5.45% of the total number of trades in the market. Again, total traded volume of ORIONPHARM in the market on that day was 13,766,341 whereas buy volume by the said client(s) was 1,715,000 which is approximately 12.46% of the total traded volume in the market.

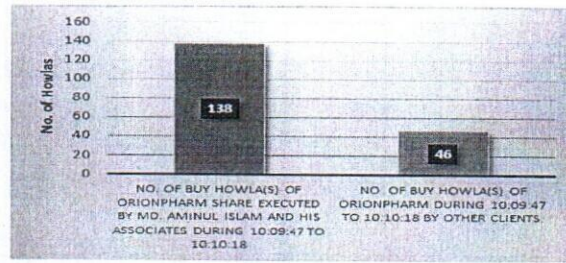
On 06-10-2021, trading of ORIONPHARM share was started at Tk. 107.00 which is Tk. 2.70 more than the YCP of Tk. 104.30. On that day, Md. Aminul Islam and his associates started series of trading at 10:09:47 at price Tk. 109.90 and induced the same to rise to Tk. 111.00 up to 10:10:18. It can also be observed from the above graph that Md. Aminul Islam and his associates executed significant trades during this time period. It is mentionable here that from 10:09:47 to 10:10:18, Md. Aminul Islam and his associates bought 470,292 shares of ORIONPHARM compared to the total traded share of 551,528. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Aminul Islam and his associates executed 138 howlas to purchase of shares of ORIONPHARM compared to the total number of howlas of 184 as shown in the following Bar Chart.



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It is observed from the above graphs and screenshot that Md. Aminul Islam and his associates bought 85.27% of the total trades of ORIONPHARM shares by executing 138 of total 184 howlas from 10:09:47 to 10:10:18 on 06-10-2021. From 10:09:47 to 10:10:18, Md. Aminul Islam and his associates induced the price to rise from Tk. 109.90 to Tk. 111.00. Thus it seems that Md. Aminul Islam and his associates were actively trying to lift the price of ORIONPHARM share.

**d) Gain and Loss by Md. Aminul Islam and his associates from 21.09.2021 to 14.10.2021:**

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
500000	95.00	47500000.00	1630000	89.49	145875000.00	9455835	93.19	881186788.50	8136335	92.66	753918006.40	90.85	739161211.00	4659500	101.97	475121986.88

Realized Capital gain(loss)per unit	1.81	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	2.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	1,47,56,795.40	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (14-10-2021)	115.20	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	13.23	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	12.98%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	6,16,52,413.12	Quantity of Stock Position x Unrealized gain (loss) per unit

Client Total	1,75,92,170
Total Vol. of period	20,97,80,351
Percentage	8.39%

As per DSE trade data, Md. Aminul Islam and his associates bought 9,455,835 shares from both block and public market and sold 8,136,335 shares of 'ORIONPHARM' in both markets during the period from 21.09.2021 to 14.10.2021. With their 04 (four) BO accounts, Md. Aminul Islam and his associates traded 8.39% shares of 'ORIONPHARM' during the investigation period and realized a capital gain of Tk. 14,756,795.40 from the trading of shares of 'ORIONPHARM' during the investigation period. It is also mentionable that they had significant amount of unrealized gain of Tk. 61,652,413.12.



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## Findings-1:

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

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

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

It is evident that *Md. Aminul Islam and his associates* were involved directly and indirectly in a series of transactions of shares of 'ORIONPHARM' with his aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

## Contraventions-1:

It appears that *Md. Aminul Islam (BOID # 1203100065474357) and his associates* have violated the following:

- **Section 17(e)(v) of the Securities and Exchange Ordinance, 1969** by directly and indirectly effecting a series of transactions of shares of 'ORIONPHARM' creating the appearance of active trading therein and raising price of the said share.

## B. Trading of Nabil Naba Foods Limited:

### a) Individual Trade Pattern of Nabil Naba Foods Limited in public market:

Date	Code # D3399				Total					
	BO ID # 1204780073985121									
	Nabil Naba Foods Limited									
	United Securities 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
22-09-2021	500000	75.90	500000	74.04	500000	75.90	37950192.90	500000	74.04	37022474.10
26-09-2021	0	0.00	212682	77.84	0	0.00	0.00	212682	77.84	16554521.90
27-09-2021	500000	85.92	0	0.00	500000	85.92	42960433.70	0	0.00	0.00
30-09-2021	425000	94.11	316806	93.92	425000	94.11	39997487.60	316806	93.92	29754289.20
03-10-2021	200155	97.05	15512	94.00	200155	97.05	19425035.00	15512	94.00	1458128.00
04-10-2021	300000	98.83	75000	95.80	300000	98.83	29649590.10	75000	95.80	7185000.00
05-10-2021	0	0.00	435155	104.30	0	0.00	0.00	435155	104.30	45385535.00
06-10-2021	200000	112.35	300000	109.92	200000	112.35	22469989.00	300000	109.92	32975847.10
07-10-2021	100000	104.26	0	0.00	100000	104.26	10426000.00	0	0.00	0.00
10-10-2021	300000	106.93	0	0.00	300000	106.93	32079057.40	0	0.00	0.00
11-10-2021	200000	109.81	0	0.00	200000	109.81	21961216.40	0	0.00	0.00
12-10-2021	150000	112.20	0	0.00	150000	112.20	16829317.00	0	0.00	0.00
<b>Total</b>	<b>2875155</b>		<b>1855155</b>		<b>2875155</b>			<b>1855155</b>		



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**b) Effects of 'ORIONPHARM' at DSE (both Public Market and Block Market) by Nabil Naba Foods Limited:**

Opening balance: 950,000 shares

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6		7	8	9	10	11	12	13	14	15	16	17
Opening Balance										950000	109.45	103973110.96						
22-09-2021	500000	75.90	37950192.90	500000	74.04	37022474.10	0	97.88	48939070.30	950000	97.88	92984233.56	18151390	75.40	7.41%	2.75%	2.75%	5.51%
26-09-2021	0	0.00	0.00	492682	78.83	38839521.90	0	97.88	48222798.06	457318	97.88	44761435.50	18678170	84.40	8.76%	0.00%	2.64%	2.64%
27-09-2021	500000	85.92	42960433.70	0	0.00	0.00	0	0.00	0.00	957318	91.63	87721869.20	10740269	85.50	1.30%	4.66%	0.00%	4.66%
30-09-2021	425000	94.11	39997487.60	316806	93.92	29754289.20	0	92.40	29271309.89	1065512	92.40	98448046.91	11890271	94.00	3.64%	3.57%	2.66%	6.24%
03-10-2021	700155	95.59	66925035.00	15512	94.00	1458128.00	0	93.66	1452860.16	1750155	93.66	163920221.74	12119040	97.60	3.83%	5.78%	0.13%	5.91%
04-10-2021	300000	98.83	29649590.10	75000	95.80	7185000.00	0	94.42	7081286.97	1975155	94.42	186488524.87	10982377	94.90	-2.77%	2.73%	0.68%	3.41%
05-10-2021	0	0.00	0.00	1225155	101.49	124335535.00	0	94.42	115675655.17	750000	94.42	70812869.70	20807725	104.30	9.91%	0.00%	5.89%	5.89%
06-10-2021	200000	112.35	22469989.00	300000	109.92	32975847.10	0	98.19	29457744.85	650000	98.19	63825113.85	13836941	109.00	4.51%	1.45%	2.17%	3.61%
07-10-2021	100000	104.26	10426000.00	0	0.00	0.00	0	0.00	0.00	750000	99.00	74251113.85	13222533	103.40	-5.14%	0.76%	0.00%	0.76%
10-10-2021	300000	106.93	32079057.40	0	0.00	0.00	0	0.00	0.00	1050000	101.27	106330171.25	6218505	104.70	1.26%	4.82%	0.00%	4.82%
11-10-2021	200000	109.81	21961216.40	0	0.00	0.00	0	0.00	0.00	1250000	102.63	128291387.65	9339662	112.10	7.07%	2.14%	0.00%	2.14%
12-10-2021	150000	112.20	16829317.00	0	0.00	0.00	0	0.00	0.00	1400000	103.66	145120704.65	11546552	112.20	0.09%	1.30%	0.00%	1.30%
<b>Total</b>	<b>3375155</b>	<b>95.18</b>	<b>321248319.10</b>	<b>2925155</b>	<b>92.84</b>	<b>271570795.30</b>	<b>0</b>	<b>95.76</b>	<b>280100725.41</b>	<b>1400000</b>	<b>103.66</b>	<b>145120704.65</b>						

**c) Gain and Loss by Nabil Naba Foods Limited from 21.09.2021 to 14.10.2021:**

Summary																
Block Buy			Block Sale			Total Buy		Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
500000	95.00	47500000.00	1070000	94.61	101235000.00	3375155	95.18	321248319.10	2925155	92.84	271570795.30	95.76	280100725.41	1400000	103.66	145120704.65

Realized Capital gain(loss)per unit	-2.92	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	-3.05%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	-85,29,930.11	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (14-10-2021)	115.20	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	11.54	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	11.14%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	1,61,59,295.35	Quantity of Stock Positon x Unrealized gain (loss) per unit

Client Total	63,00,310
Total Vol. of period	20,97,80,351
Percentage	3.00%





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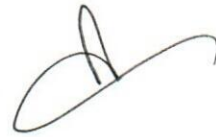
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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ৩০, ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪১৫/২০২৩/৩৪৫ স্মারকমূলে Nabil Naba Foods Limited-কে মে ২১, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত তারিখ মে ২৮, ২০২৩ এ Nabil Naba Foods Limited এর পক্ষে Mr. Nurullah Al Mansur Taluder এবং Mr. Md. Razib Al Mamun শুনানীতে উপস্থিত হয়ে মে ২২, ২০২৩ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

*"I am Md. Aminul Islam, managing director of Nabil Naba Foods Ltd. Our diverse line of products includes but is not limited to, Atta, Maida, Suji, Dali, and Rice, and are distributed throughout the country. Our products are certified by BSTI and are of the highest quality. At Nabil Naba Foods, we believe you should enjoy what you eat and still be able to live a healthy life. That is why we are dedicated to making the food that people love even better. We support programs and partnerships that help to educate and induce people to make healthy choices. Our company is also involved in stock trading and actively invests in the local capital market. In this instance, it has never been involved in any non-compliance issues in the Bangladesh stock market, according to my knowledge.*

*Regarding your given data, Nabil Naba Foods Ltd. bought and sold shares of ORIONPHARMA from 21.09.2021 to 14.01.2021. During that period the shares were trading at a P/E ratio of 17.51, with decent dividend history, and seemed like they had high growth potential. All of these factors contributed to my decision in taking a healthy position in this stock. The frequent buying and selling of shares were done to take short-term profit, if possible, based on the daily, weekly, and monthly volume and technical analysis. We hereby confess that; we have never done or been willing to take any undue advantage which may cause any inconvenience for the market or general investor. I firmly believe that the amount of investment and profit doesn't reflect the accusations.*

*In the above context, the entire allegation regarding the company's non-compliance with securities-related laws was a complete misunderstanding and becomes a question to our reputation which is gained for a decade. Moreover, your concern is appreciated and valuable learning for me to ensure compliance and good governance while trading in the days to come."*





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যেহেতু, Nabil Naba Foods Limited-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তার বিরুদ্ধে উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Nabil Naba Foods Limited-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Nabil Naba Foods Limited উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লংঘন করেছেন;

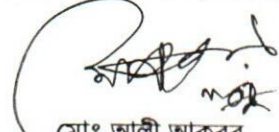
যেহেতু, Nabil Naba Foods Limited-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Nabil Naba Foods Limited-কে অর্ধদণ্ডে 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-

- Nabil Naba Foods Limited-কে মোট ১০.০০ (দশ) লক্ষ টাকা অর্ধদণ্ডে 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,

  
মোঃ আলী আকবর  
কমিশনার  
০২/০২/২০২১

## বিতরণ:

- ১। **Nabil Naba Foods Limited**  
(BO ID # 1204780073985121)  
Jui Appartment Complex, House # 13,  
Flat # 4, Road # 17, Block # D,  
Banani, Dhaka.