



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

বিএসইসি/এনফোর্সমেন্ট/২৯১৬/২০২০/৬২৬

তারিখ: আগস্ট ২৭, ২০২৩

Managing Director  
Sinha Securities Limited  
(DSE TREC Holder No. 067)  
Rahman Mansion (3<sup>rd</sup> Floor, West Side),  
161, Motijheel C/A, Dhaka-1000.

## বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/২৯১৬/২০২০/৬২৬ তারিখ: আগস্ট ২৭, ২০২৩ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

27.08.2023

মোঃ মাহমুদুল হাসান

সহকারী পরিচালক (এনফোর্সমেন্ট)

মোবাইল নম্বর: +৮৮ ০১৫১৫২৯২১৯৫

ই-মেইল- [mahmudulhasan@sec.gov.bd](mailto:mahmudulhasan@sec.gov.bd)

### অবগতির জন্য অনুলিপি:

- ১। নির্বাহী পরিচালক, মার্কেট ইন্টারমেডিয়েটারিজ এফেয়ার্স ডিভিশন, বিএসইসি পরিদর্শন রেফারেন্স নম্বর- বিএসইসি/এসআরআই/আইএনএস/২০১৮/খন্ড-০১/১০৭১, তারিখ ডিসেম্বর ২৯, ২০২০।
- ২। নির্বাহী পরিচালক, আইসিটি ডিভিশন, বিএসইসি,
- ৩। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।



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তারিখঃ আগস্ট ২৭, ২০২০

## 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, ডিসেম্বর ২৯, ২০২০ তারিখের BSEC instruction No. বিএসইসি/এসআরআই/আইএনএস/২০১৮/খন্ড-১/১০৭১ এবং সেপ্টেম্বর ১৩, ২০২২ তারিখের BSEC letter No. BSEC/Enforcement/2916/2020/1197 অনুযায়ী প্রদত্ত নির্দেশনায় ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ডিসেম্বর ২৩, ২০২১ এবং জানুয়ারি ২২, ২০২৩ সময়ের জন্য Sinha Securities Limited-এর নিয়মিত লেনদেন কার্যাবলী সংক্রান্ত পরিদর্শন (Inspection) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত দুটি প্রতিবেদন দাখিল করেছে। পরিদর্শন প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

### Observations and Findings Regarding Inspection report on Sinha Securities Limited:

- i) After randomly scrutinizing, it was observed that the Company opened more than one individual and joint BO Accounts of some single clients with the Company. Details of the accounts are given below:

Sl. No.	BO IDs	BO Type	Client Codes	Clients' Name	BO Father/Husband	BO Mother
1	1203140033605849	Individual	58970	S.M.M. Saydul Arefin	Late Dr. Shah Amzad Hossain	Mrs. Aziza Begum
	1203140068218855	Individual	202098	S.M.M. Saydul Arefin	Shah Amzad Hossain	Mss. Aziza Hossain
2	1203140016469713	Individual	40240	Md. Abdullah Al Shafi	Late Abdur Rafet Biswas	Mrs. Hafiza Begum
	1203140016469721	Individual	40241	Md. Abdullah Al Shafi	Late Abdur Rafet Biswas	Mrs. Hafiza Begum
3	1203140004329121	Individual	837	Nirmal Kumer Sarker	Makhan Sarker	Mamata Sarker
	1203140055278025	Individual	166206	Nirmal Kumer Sarker	Makhan Sarker	Mamata Sarker
4	1203140007630826	Individual	6632	Sk Md. Shahid	Md. Abdul Karim	Rokeya Begum
	1203140068936045	Individual	202156	Sk. Md. Shahid	Md. Abdul Karim	Rokeya Begum
5	1203140032559468	Individual	94387	Md. Noor E Alam Shawn	Md. Sahabuddin	Amena Nasrin
	1203140074266451	Individual	193242	Md. Noor-E-Alam	Md. Shahabuddin	Amena Nasrin
6	1203140016474362	Individual	40017	Abdul Hamid	Late Haji Abdul Halim	Late Khodeja Khatun
	1203140054163715	Individual	142929	Abdul Hamid	Late Haji Abdul Halim	Late Khodeja Khatun
7	1203140018287442	Individual	45319	Mr Augustine Gomes	Mr Peter Gomes	Mrs Parul Gomes
	1203140043410143	Individual	67961	Mr. Augustine Gomes	Late- Peter Gomes	Mrs. Methilda Parul Gomes
	1203140043651631	Individual	67978	Augustine Gomes	Late. Peter Gomes	Mrs. Methilda Parul Gomes
8	1203140030306881	Individual	62838	Ashok Kumar Das	Arjun Kumar	Shahazadi
	1203140041175715	Individual	160761	Ashok Kumar Das	Late- Setaram Das	Late- Shahazadi Rani
9	1203140043862036	Individual	145175	Mrs. Monira Mamtaj Jahan	Md. Monir Uddin	Hafiza Akter
	1203140057381962	Individual	71615	Monira Mamtaj Jahan	Md. Monir Uddin	Hafiza Akter
10	1203140030392215	Individual	65673	Md. Nuru Sheikh	Md. Taisuddin Sheikh	Mist. Batashi Begum
	1203140030394878	Individual	65676	Md. Nuru Sheikh	Md. Taizuddin Sheikh	Mst. Batashi
11	1203140028950445	Individual	36617	Md. Tipu Shikdar	Mohammad Ali Shikdar	Aklima Akter



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No.	BO IDs	BO Type	Client Codes	Clients' Name	BO Father/Husband	BO Mother
	1203140035228292	Individual	37787	Md. Titu Shikdar	Muhammed Ali Shikdar	Aklima Akter
12	1203140027655750	Joint Holder	43225	Mahira Begum & Sheikh Yunus Ali	S.M Ashraf Ali	Rokeya Begum
	1203140027655932	Joint Holder	43231	Masuda Sayed & Shaikh Yunus Ali	Saydur Rahman	Rokeya Begum
13	1203140027656078	Joint Holder	43234	Marufa Khatun & Shawon Chowdhury	Shaikh Yunus Ali	Rokeya Begum
	1203140027656118	Joint Holder	43233	Shabbir Rahman & Shawon Chowdhury	Saydur Rahman	Masuda Sayed
14	1203140063877252	Joint Holder	130677	M. A. Hashem Afgani & Nuzhat Anjum	Late- Wazi Ullah	Late- Sufia Khatun
	1203140064491331	Joint Holder	130681	Naushin Anjum & Nuzhat Anjum	M.A. Hashem Afgani	Begum Dilara Hashem
15	1203140049052511	Joint Holder	159172	Md. Sultanul Arefin Porag & Md. Mahabbat Ali	Md. Ashraful Islam	Mst. Akhilarun Nesa
	1203140049201128	Joint Holder	159260	Md. Kuddus Khan & Md. Mahabbat Ali	Late Harun-Or-Rashid Khan	Amena Begum
	1203140049201152	Joint Holder	159258	Md. Siddikur Rahman Khan & Md. Mahabbat Ali	Late Harun-Or-Rashid	Mst. Amena Begum
	1203140049206634	Joint Holder	159252	Md. Anower Hossain Sarder & Md. Siddikur Rahman Khan	Late Kasem Ali Sarder	Late Kadvan Khatun
16	1203140049196320	Joint Holder	159264	Mst. Masuma Begum & Mst. Rosanara	Md. Habibur Rahman	Mst. Nurjahan Brgum
	1203140049201179	Joint Holder	159250	Mst. Rosanara & Mst. Masuma Begum	Md. Habibur Rahman	Mst. Nurjahan
17	1203140049052544	Joint Holder	159174	Mst. Sonia Sultana & Mst. Arifa Begum	Md. Azizur Rahman	Mst. Sajeda Rahman
	1203140049196502	Joint Holder	159262	Mst. Hira Begum & Mst. Arifa Begum	Late Mobarok Sarder	Mst. Rabeya Begum
18	1203140011480932	Joint Holder	13160	Ms. Runa Afroz & Md. Quamrul	Kamrul Huq	Sufia Begum
	1203140011481061	Joint Holder	13155	Sufia Begum & Md. Quamrul	Kamrul Huq	Asia Begum
19	1203140018423753	Joint Holder	22425	Md. Kamrul Hasan & Md. Asraful Islam Ripon	Md. Alauddin	Mst. Anwara Khatun
	1203140030725164	Joint Holder	100250	Md. Kamrul Hasan & Md. Abdul Baten	Md. Tofajjol Hosen	Mst. Maleka Begum
20	1203140020986241	Joint Holder	45803	Shahanaz Perveen & Sk. Tanvir Ahmmed	Md. Nazrul Islam	Nurzahan Begum
	1203140024036330	Joint Holder	47001	S.K.Belal Ahmed & Prven Fatema	Sk.Siddque Ahmed	Mrs.Hameda Khatun
21	1203140036920812	Joint Holder	80880	Sumon Saha & China Saha	Subodh Saha	Tulsi Saha
	1203140036923302	Joint Holder	80882	Mritunjoy Saha & China Saha	Gobindo Lal Saha	Sova Rani Saha
22	1203140037632191	Joint Holder	160121	Md. Kanchan Ali Howlader & Feroz Mia	Sawad Ali	Malaka
	1203140037660060	Joint Holder	160119	Md. Mohodul & Feroz Mia	Md. Eounus	Gosna Begum
23	1203140038150787	Joint Holder	102826	Md. Nazrul Islam & Md. Ziaur Rahman	Md. Abed Ali Prodhan	Late Zobeda Begum
	1203140042019180	Joint Holder	103545	Md. Ziaur Rahman & Razibul Hassan	Md. Hasen Ali	Zobeda Akhter



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24	1203140028533340	Joint Holder	87028	Md. Anis Miah & Salma Akter	Md. Cano Miah	Mrs. Sufia Khatun\
	1203140028533359	Joint Holder	87029	Md. Moslem Uddin & Salma Akter	Late Dalowar Hossain	Poriskarer Nesha
25	1203140021960506	Joint Holder	27315	Md. Shohidul Hoque & Bikash Chandra Halder	Aftaj Uddin	Mrs. Shajeda Begum
	1203140021960514	Joint Holder	27316	Bikas Chandra Halder & Md. Shohidul Hoque	Pouchanondan Halder	Rita Rani Halder
26	1203140024043152	Joint Holder	28639	Jahangir Alam Manik & Bablu Kumar Shil	Late Abdul Goni Bhuiya	Moss. Rahima Khaton
	1203140024043516	Joint Holder	28645	Bablu Kumar Shil & Md. Makbul Hossain	Binoy Bushan Shill	Lakhi Rani Shil
	1203140024043286	Joint Holder	28641	Md. Mokbul Hossain & Jahangir Alam Manik	Joynal Abedun	Moss. Julekha Bibi
27	1203140024043409	Joint Holder	28643	S.M. Ikramul Kabir & Moholon Sangma	Md. Yousuf Ali	Moss. Aklima Begum
	1203140024043666	Joint Holder	28647	Shima Khanom & S.M. Ikrmul Kabir	Md. Alam Akon	Rani Begum
28	1203140028327360	Joint Holder	86397	Mamtaj Begum & Abdul Matin	Zahid Hasan	Rasheda Begum
	1203140028327419	Joint Holder	86396	Zahid Hasan & Abdul Matin	Hazi Rahamat Ali	Halima Begum
29	1203140031470268	Joint Holder	115080	Utpal Dutta & Monju Rani Das	Nalini Dutta	Aruna Dutta
	1203140031804912	Joint Holder	115414	Sanjoy Chandra Das & Monju Rani Das	Bijoy Chandra Das	Monju Rani Das
30	1203140072161468	Joint Holder	176272	Jesmin Ara Begum & Nishat Jahan	Md. Shah Jamal	Late. Noor Jahan Begum
	1203140072176160	Joint Holder	176276	Md. Ikbal Hossen & Nishat Jahan	Md. Altaf Hossen Buiya	Rokaya Begum
31	1203140038740144	Joint Holder	118888	Md. Abbas Ali & Md. Faroque Sardar	Late. Dorbash Ali	Halia Begum
	1203140038740235	Joint Holder	118787	Rahima Begum & Md. Faroque Sardar	Md. Abbas Ali	Shafia Begum

Whereas as per the ডিপজিটরি (ব্যবহারিক) প্রবিধানমালা, ২০০৩ এর প্রবিধান ২৬(১), “ডিপজিটরির সেবা গ্রহন করিতে ইচ্ছুক ব্যক্তি তাহার পছন্দমতো ডিপজিটরি অংশগ্রহনকারীর সহিত হিসাব খুলিতে পারিবে-.....তবে শর্ত থাকে যে, প্রাতিষ্ঠানিক বিনিয়োগকারী ব্যক্তিত কেহ একই ডিপজিটরি অংশগ্রহনকারীর সহিত একাধিক হিসাব খুলিতে পারিবে না।”

It appeared that the company violated:

- ডিপজিটরি (ব্যবহারিক) প্রবিধানমালা, ২০০৩ এর প্রবিধান ২৬(১)

by maintaining more than one individual and joint BO Accounts of the aforesaid single clients.

**Updated Status:**

The monitoring team of DSE collected BO Closed (DP04) reports of the aforesaid BO Accounts, verified the status of those BO accounts and found the following present status:

Sl. No.	BO IDs	BO Type	Client Codes	Clients' Name	BO Father/Husband	BO Mother	Present Status
1	1203140033605849	Individual	58970	S.M.M. Saydul Arefin	Late Dr. Shah Amzad Hossain	Mrs. Aziza Begum	Closed
	1203140068218855	Individual	202098	S.M.M. Saydul Arefin	Shah Amzad Hossain	Mrs. Aziza Hossain	Active
2	1203140016469713	Individual	40240	Md. Abdullah Al Shafi	Late Abdur Rafet Biswas	Mrs. Hafiza Begum	Closed
	1203140016469721	Individual	40241	Md. Abdullah Al Shafi	Late Abdur Rafet Biswas	Mrs. Hafiza Begum	Active
3	1203140004329121	Individual	837	Nirmal Kumer Sarker	Makhan Sarker	Mamata Sarker	Closed



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4	1203140007630826	Individual	6632	Sk Md.Shahid	Md.Abdul Karim	Rokeya Begum	Closed
	1203140068936045	Individual	202156	Sk. Md. Shahid	Md. Abdul Karim	Rokeya Begum	Active
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7	1203140018287442	Individual	45319	Mr Augustine Gomes	Mr Peter Gomes	Mrs Parul Gomes	Closed
	1203140043410143	Individual	67961	Mr. Augustine Gomes	Late- Peter Gomes	Mrs. Methilda Parul Gomes	Active
	1203140043651631	Individual	67978	Augustine Gomes	Late. Peter Gomes	Mrs. Methilda Parul Gomes	Active
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10	1203140030392215	Individual	65673	Md. Nuru Sheikh	Md. Taisuddin Sheikh	Mist. Batashi Begum	Closed
	1203140030394878	Individual	65676	Md. Nuru Sheikh	Md. Taizuddin Sheikh	Mst. Batashi	Active
11	1203140028950445	Individual	36617	Md. Tipu Shikdar	Mohammad Ali Shikdar	Aklima Akter	Active
	1203140035228292	Individual	37787	Md. Titu Shikdar	Muhammed Ali Shikdar	Aklima Akter	Closed
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	1203140027656118	Joint Holder	43233	Shabbir Rahman & Shawon Chowdhury	Saydur Rahman	Masuda Sayed	Closed
14	1203140063877252	Joint Holder	130677	M. A. Hashem Afgani & Nuzhat Anjum	Late- Wazi Ullah	Late- Sufia Khatun	Active
	1203140064491331	Joint Holder	130681	Naushin Anjum & Nuzhat Anjum	M.A. Hashem Afgani	Begum Dilara Hashem	Active
15	1203140049052511	Joint Holder	159172	Md. Sultanul Arefin Porag & Md. Mahabbat Ali	Md. Ashraful Islam	Mst. Akhilarun Nesa	Closed

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	1203140049201128	Joint Holder	159260	Md. Kuddus Khan & Md. Mahabbat Ali	Late Harun-Or-Rashid Khan	Amena Begum	Closed
	1203140049201152	Joint Holder	159258	Md. Siddikur Rahman Khan & Md. Mahabbat Ali	Late Harun-Or-Rashid	Mst. Amena Begum	Closed
	1203140049206634	Joint Holder	159252	Md. Anower Hossain Sarder & Md. Siddikur Rahman Khan	Late Kasem Ali Sarder	Late Kadvan Khatun	Closed
16	1203140049196320	Joint Holder	159264	Mst. Masuma Begum & Mst. Rosanara	Md. Habibur Rahman	Mst. Nurjahan Brgum	Closed
	1203140049201179	Joint Holder	159250	Mst. Rosanara & Mst. Masuma Begum	Md. Habibur Rahman	Mst. Nurjahan	Closed
17	1203140049052544	Joint Holder	159174	Mst. Sonia Sultana & Mst. Arifa Begum	Md. Azizur Rahman	Mst. Sajeda Rahman	Closed
	1203140049196502	Joint Holder	159262	Mst. Hira Begum & Mst. Arifa Begum	Late Mobarok Sarder	Mst. Rabeya Begum	Closed
18	1203140011480932	Joint Holder	13160	Ms. Runa Afroz & Md. Quamrul	Kamrul Huq	Sufia Begum	Active
	1203140011481061	Joint Holder	13155	Sufia Begum & Md. Quamrul	Kamrul Huq	Asia Begum	Closed
19	1203140018423753	Joint Holder	22425	Md. Kamrul Hasan & Md. Asraful Islam Ripon	Md. Alauddin	Mst. Anwara Khatun	Active
	1203140030725164	Joint Holder	100250	Md. Kamrul Hasan & Md. Abdul Baten	Md. Tofajjol Hosen	Mst. Maleka Begum	Active
20	1203140020986241	Joint Holder	45803	Shahanaz Perveen & Sk. Tanvir Ahmmad	Md. Nazrul Islam	Nurzahan Begum	Active
	1203140024036330	Joint Holder	47001	S.K.Belal Ahmed & Prven Fatema	Sk.Siddque Ahmed	Mrs.Hameda Khatun	Closed
21	1203140036920812	Joint Holder	80880	Sumon Saha & China Saha	Subodh Saha	Tulsi Saha	Closed
	1203140036923302	Joint Holder	80882	Mritunjoy Saha & China Saha	Gobindo Lal Saha	Sova Rani Saha	Closed
22	1203140037632191	Joint Holder	160121	Md. Kanchan Ali Howlader & Feroz Mia	Sawad Ali	Malaka	Active
	1203140037660060	Joint Holder	160119	Md. Mohodul & Feroz Mia	Md. Eonus	Gosna Begum	Closed
23	1203140038150787	Joint Holder	102826	Md. Nazrul Islam & Md. Ziaur Rahman	Md. Abed Ali Prodhan	Late Zobeda Begum	Active
	1203140042019180	Joint Holder	103545	Md. Ziaur Rahman & Razibul Hassan	Md. Hasen Ali	Zobeda Akhter	Active
24	1203140028533340	Joint Holder	87028	Md. Anis Miah & Salma Akter	Md. Cano Miah	Mrs. Sufia Khatun	Active
	1203140028533359	Joint Holder	87029	Md. Moslem Uddin & Salma Akter	Late Dalowar Hossain	Poriskarer Neshah	Active

# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

No.	BO IDs	BO Type	Client Codes	Clients' Name	BO Father/Husband	BO Mother	Present Status
25	1203140021960506	Joint Holder	27315	Md. Shohidul Hoque & Bikash Chandra Halder	Aftaj Uddin	Mrs. Shajeda Begum	Closed
	1203140021960514	Joint Holder	27316	Bikas Chandra Halder & Md. Shohidul Hoque	Pouchanondan Halder	Rita Rani Halder	Active
26	1203140024043152	Joint Holder	28639	Jahangir Alam Manik & Bablu Kumar Shil	Late Abdul Goni Bhuiya	Moss. Rahima Khaton	Active
	1203140024043516	Joint Holder	28645	Bablu Kumar Shil & Md. Makbul Hossain	Binoy Bushan Shill	Lakhi Rani Shil	Closed
	1203140024043286	Joint Holder	28641	Md. Mokbul Hossain & Jahangir Alam Manik	Joynal Abedun	Moss. Julekha Bibi	Closed
27	1203140024043409	Joint Holder	28643	S.M. Ikramul Kabir & Moholon Sangma	Md. Yousuf Ali	Moss. Aklima Begum	Active
	1203140024043666	Joint Holder	28647	Shima Khanom & S.M. Ikrmul Kabir	Md. Alam Akon	Rani Begum	Closed
28	1203140028327360	Joint Holder	86397	Mamtaj Begum & Abdul Matin	Zahid Hasan	Rasheda Begum	Active
	1203140028327419	Joint Holder	86396	Zahid Hasan & Abdul Matin	Hazi Rahamat Ali	Halima Begum	Active
29	1203140031470268	Joint Holder	115080	Utpal Dutta & Monju Rani Das	Nalini Dutta	Aruna Dutta	Active
	1203140031804912	Joint Holder	115414	Sanjoy Chandra Das & Monju Rani Das	Bijoy Chandra Das	Monju Rani Das	Active
30	1203140072161468	Joint Holder	176272	Jesmin Ara Begum & Nishat Jahan	Md. Shah Jamal	Late. Noor Jahan Begum	Active
	1203140072176160	Joint Holder	176276	Md. Iqbal Hossen & Nishat Jahan	Md. Altaf Hossen Buiya	Rokaya Begum	Closed
31	1203140038740144	Joint Holder	118888	Md. Abbas Ali & Md. Faroque Sardar	Late. Dorbash Ali	Halia Begum	Closed
	1203140038740235	Joint Holder	118787	Rahima Begum & Md. Faroque Sardar	Md. Abbas Ali	Shafia Begum	Closed

The rest of the accounts that were supposed to be closed are still active. The company, in their reply, has given us an explanation regarding why the accounts have not been closed yet.

“We would like to inform you that we have already informed to individual/joint BO account holders. As per your letter clause No. 3, we cannot close the accounts because of shows some shares of the mentioned Code No. 67961, 130677, 130681, 22425, 100250, 103545, 87028, 87029, 86396, 86397, 115080, 115414. Otherwise, the folio mentioned shares are in floor price and no transaction for a long time. So, they are trying to sell. After sale, we will close the codes and will inform to you. The folio No. 58970 & 65673 already closed (copy enclosed). So, we are sorry for our unintentional mistake.”

**Remarks from the Monitoring Team:**

From the above discussion, the Monitoring Team observed that the Company partially rectified the above non-compliances, although the company said to the BSEC that all the required BO Accounts had been closed.

- ii) After randomly checking, it was observed that the Company was maintaining Customer and BO accounts in the name of some Authorized Representatives with the company. Details of the account are given below:

# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Client Codes	BO Type	Clients' Name	BO IDs	BO Status	Remarks
23640	Individual	Sheikh Abdullah Al Mamun	1203140000735781	Active	Authorized Representatives of the Company
128780	Individual	Mst. Ruksana Parvin	1203140060562031	Active	
54588	Joint Holder	Mohammad Iqbal Bhuiyan & Md. Main Uddin Bhuiyan	1203140026533231	Active	
54587	Individual	Mohammad Iqbal Bhuiyan	1203140026535560	Active	
80002	Joint Holder	Rockshana Parveen & Hasmotrur Rahman	1203140026161289	Active	Authorized Representatives of the Company
511	Joint Holder	Daba Brata Narayan Chowdhury & Kakali Debnath	1203140000909189	Active	
105401	Joint Holder	Md. Liton & Md. Saiful	1203140057461332	Active	
45247	Joint Holder	Tania Sultana & Md. Saiful Islam	1203140017792651	Active	
152658	Joint Holder	S. M. Ezazul Haque & Sagar Ahmed	1203140065369185	Active	

Whereas, as per Deed of Agreement, clause-5 under সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ভিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ৪(২)(৪), "Authorized Representative shall not conduct buy or sell of any security in the Stock Exchange in his/her own account or for the account of any of his family member in the capacity of being Authorized person of any Beneficiary Owner (BO) Account holder."

It appeared that the company and the concerned Authorized Representatives violated:

- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ভিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ৪(২)(৪) এর Deed of Agreement, clause-5

by maintaining Customer and BO accounts in the name of some Authorized Representatives of the company.

#### Updated Status:

The monitoring team of DSE collected BO Closed (DP04) reports of the aforesaid BO Accounts, verified the status of those BO accounts and found the following present status:

Clients' Codes	BO Type	Clients' Name	BO IDs	Present Status
23640	Individual	Sheikh Abdullah Al Mamun	1203140000735781	Active
128780	Individual	Mst. Ruksana Parvin	1203140060562031	Closed
54588	Joint Holder	Mohammad Iqbal Bhuiyan & Md. Main Uddin Bhuiyan	1203140026533231	Authorized Representative status withdrawn.
54587	Individual	Mohammad Iqbal Bhuiyan	1203140026535560	Authorized Representative status withdrawn.
80002	Joint Holder	Rockshana Parveen & Hasmotrur Rahman	1203140026161289	Active
511	Joint Holder	Daba Brata Narayan Chowdhury & Kakali Debnath	1203140000909189	Closed
105401	Joint Holder	Md. Liton & Md. Saiful	1203140057461332	Closed
45247	Joint Holder	Tania Sultana & Md. Saiful Islam	1203140017792651	Active
152658	Joint Holder	S. M. Ezazul Haque & Sagar Ahmed	1203140065369185	Closed

From the above, it was observed that the Company had partially rectified the non-compliances regarding maintaining Customer and BO accounts in the name of some Authorized Representatives of the company.

- iii) After randomly scrutinizing the list of clients (DP #29) provided by the company, it was observed that the same mobile number was used in total 27 (twenty-seven) active BO Accounts of different clients. Which is shown in the. It is mentionable here that the said mobile number is being used by the one of your Authorized Representatives. Details of which is given below:





# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Name	Status	Father's and Mother's Name	Address	Mobile No.
Mr. Golam Mohiuddin	Authorized Representative	Rafiqul Islam, Shahnaz Begum	Vill- Yousuf Ali Sarker Kandi, P.O- Sakhipur, P.S- Sakhipur Dist: Shariatpur	01937404620

Whereas as per the BSEC circular no. বিএসইসি/সিডিএস/১০/২০১৬/৪৩৫ তারিখ জুন ২০, ২০১৯; "ইদানিংকালে লক্ষ্য করা যাচ্ছে যে, একই জাতীয় পরিচয়পত্র, মোবাইল নাম্বার এবং ব্যাংক হিসাব নাম্বার কিছু ক্ষেত্রে বিভিন্ন বিও হিসাবে ব্যবহার করা হচ্ছে যা বেআইনি এবং কোনক্রমেই কাম্য নয়। এই সার্কুলারের মাধ্যমে সকল ডিপোজিটরি অংশগ্রহণকারী দৃষ্টি আকর্ষণ করা যাচ্ছে যে, তাদের নিকট রক্ষিত বিও হিসাবে এই ধরনের সমস্যা থাকলে তা আগামী ২১ জুলাই, ২০১৯ এর মধ্যে সংশোধন করতে হবে। উল্লেখ্য, যে ব্যক্তির নামে বিও হিসাব ঠিক তারই জাতীয় পরিচয়পত্র, মোবাইল নাম্বার এবং ব্যাংক হিসাব ব্যবহার করতে হবে, কোনক্রমেই অন্যের জাতীয় পরিচয়পত্র, মোবাইল নাম্বার বা ব্যাংক হিসাব ব্যবহার করা যাবে না।"

It appeared that the company and the concerned Authorized Representative violated:

- BSEC circular no. বিএসইসি/সিডিএস/১০/২০১৬/৪৩৫ তারিখ জুন ২০, ২০১৯;

by opening several BO Accounts of different clients using the same mobile number of an Authorized Representative.  
**Updated Status:**

After the DSE team scrutinized the recent data, it appeared that Sinha Securities Limited has rectified the phone numbers in all 27 (twenty-seven) BO Accounts.

- iv) After checking relevant documents, it was observed the company made cash payments to some of their clients several times as shown below:

Clients' Codes	Clients' Name	Date	Doc. No	Narration	Amount Payments
741	Kazi Habiba	19-05-21	83419	By Cash	102,000.00
		25-05-21	83552	By Cash	108,000.00
3188	Shantush Debnath	27-04-21	83024	By Cash	110,000.00
4108	Alim Z. Chowdhury	05-04-21	82702	By Cash	490,000.00
14500	Md. Rashidul Islam &	27-04-21	83022	By Cash	300,000.00
		05-05-21	83136	By Cash	200,000.00
20881	Rezaur Rahman Sinha	13-07-21	84081	By Cash	316,000.00
21990	Mynuddin Ahamed	13-06-21	83234	By Cash	176,000.00
25162	Mrs. Shamima Nasrin	10-03-21	82287	by cash	218,000.00
47602	Mt. Farzana	17-06-21	TP 00001	By Cash	140,000.00
47603	Md. Shahin Imtiaz Kabir	17-06-21	TP 00002	By Cash	138,000.00
48207	Mt. Farzana And Muhammod Firoj Alom	17-06-21	TP 00003	By Cash	110,000.00
48208	Md. Shahin Imtiaz Kabir And Md. Bashir Ahamed Gitu	17-06-21	TP 00004	By Cash	135,000.00
58572	Rita Roy	03-03-21	82132	by cash	245,000.00
81545	Mafuza Akter And Feroja Begum	31-05-21	82737	By Cash	112,000.00
88919	Md. Kamal Hossain	06-06-21	83017	By Cash	146,300.00
94105	Md. Yousf Goni	01-06-21	82810	by cash	428,500.00
98519	Md. Mahfuzur Rahman	03-05-21	83101	By cash	150,000.00
122900	Md. Anisur Rahman And Mahmuda Begum	04-04-21	82694	by cash	300,000.00
		11-04-21	82838	by cash	335,000.00
		07-06-21	83052	by Cash	300,000.00
		17-06-21	83617	By Cash	150,000.00
125704	Bazlul Haque Khondker	04-03-21	82167	by cash	200,000.00
		16-03-21	82401	by cash	300,000.00
		25-03-21	82479	By Cash	200,000.00
		04-04-21	82694	by cash	200,000.00
		13-04-21	82872	by cash	200,000.00
		06-05-21	83143	By Cash	200,000.00
		20-05-21	83501	by cash	200,000.00
		02-06-21	82881	By cash	200,000.00
13-06-21	83247	By Cash	200,000.00		

# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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Clients' Codes	Clients' Name	Date	Doc. No	Narration	Amount Payments
126600	Santo Agro & Trading Farms Ltd.	27-07-21	84384	By Cash	200,000.00
129989	Nahida Akter	06-04-21	82772	By cash	499,000.00
130001	Sheikh Mohammad Moinul Islam	18-10-20	78922	by cash	800,000.00
130700	Barkat Ali	31-05-21	82699	By cash	243,000.00
130702	Mohammad Fayej Ahmed	08-07-21	84035	By Cash	140,000.00
157082	Dr. Kazi Rezaul Islam	04-05-21	83104	By cash	205,000.00
166601	Md. Abdul Khaleque	06-06-21	83025	By Cash	105,000.00
175085	Md.Hafizur Rahman	02-06-21	82946	By Cash	156,000.00
200797	Md. Rakibul Haque Pradhan And Mazada Begum	03-02-21	81645	by cash	652,190.00
		07-04-21	82792	By cash	499,000.00
202176	Md.Farid Ahmed	15-10-20	78895	by cash	800,000.00
		18-10-20	78916	by cash	800,000.00

Whereas as per the Rule 6(1) of Securities and Exchange Rules, 2020, "Provided further that all receipts and payments in respect of all transactions, or series of transactions, shall be carried out through account payee cheque, payment order or bank draft, or any other mode of banking channel or systems as approved or recognized by Bangladesh Bank:"

Whereas as per the সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১, "প্রত্যেক স্টক ডিলার, স্টক ব্রোকার এবং অনুমোদিত প্রতিনিধি সর্বোচ্চ সততা ও বিশ্বস্ততার সহিত তাহার কাজকর্ম পরিচালনা করিবেন এবং আইন, অধ্যাদেশ, এই বিধিমালা এবং দ্বিতীয় তফসিলে বিধৃত আচরণ বিধিসহ নিবন্ধন সনদের সকল শর্তাবলী যথাযথভাবে পালন করিবেন।"

And as per the সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর দ্বিতীয় তফসিল এর আচরণ বিধি ১ "প্রত্যেক স্টক ডিলার, স্টক ব্রোকার ও অনুমোদিত প্রতিনিধিকে তাহার ব্যবসা ও এতদসংক্রান্ত কার্যাদি পরিচালনার ক্ষেত্রে সুনাম, দক্ষতা, বিশ্বস্ততা ও সততা বজায় রাখিতে হইবে।"

It appeared that the Company violated:

- Rule 6(1) of the Securities and Exchange Rules, 2020;
- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১;
- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর দ্বিতীয় তফসিল এর আচরণ বিধি ১।

by making cash payments to some clients of the Company.

**Updated Status:**

After checking and scrutinizing the recent data for the period from 01 February 2022 to 31 January 23, there has been found no instances of cash payment to the clients.

- v) After checking relevant documents, it was observed the company made margin agreement with some clients who were not eligible for margin facility from their company. Details of which are show below:

BO IDs	BO Type	Client Codes	Name	Remarks
1203140004226205	Joint Holder	743	Shah Alam & Afroza Binta Harun	Brother of Mr. Md. Mahbubul Alam who is TREC Representative, Manager of Accounts & Authorized Representative of the company
1203140004120338	Individual	16006	Mahbuba Amin	Sister of Mr. Md. Mahbubul Alam who is TREC Representative, Manager of Accounts & Authorized Representative of the company
1203140017468753	Joint Holder	21410	Hosne Ara Begum & Sk. Imranul Karim	Mother of Mr. Sheikh Abdullah Al Mamun, In-Charge, Accounts & Authorized Representative
1203140000076745	Individual	164	Pranjit Kumar Roy	Compliance Officer, Patuatoli Branch
1203140019847688	Individual	30418	Humayra Marzia Khanom	Wife of Mr. Md. Saadat Hossain, Manager
1203140026161289	Joint Holder	80002	Rockshana Parveen & Hasmotrur Rahman	Mr. Md. Hasmothur Rahman is a Manager, Extension Office Branch & Authorized Representative



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BO IDs	BO Type	Client Codes	Name	Remarks
1203140026161302	Individual	80003	H.A.M Rasiyat	Son of Mr. Md. Hasmothur Rahman who is a Manager, Extension Office Branch & Authorized Representative.
1203140033864960	Individual	130001	Sheikh Mohammad Moinul Islam	Manager of the company

Whereas, as per the BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010, "it is further directed that the stock brokers shall not provide margin facilities to any member of the Board of Directors of its own company, officer and staff employed in the company management, their parent, spouse, son, daughter, sister, brother, son-in-law, daughter-in-law and other relatives as per directive issued by the Commission from time to time".

It appeared that the company violated:

- BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010.

by executing margin agreements with the employees and relatives of employees of the Company.

**Updated Status:**

After scrutinizing the ledger for the period between 01 February 2022 to 31 January 2023, it has been found that only two accounts have been adjusted as on 31 January 2023 while the rest of the accounts are still having negative balances.

BO IDs	BO Type	Client Codes	Name	Present Status as on 31 January 2023
1203140004226205	Joint Holder	743	Shah Alam & Afroza Binta Harun	Not adjusted
1203140004120338	Individual	16006	Mahbuba Amin	Not adjusted
1203140017468753	Joint Holder	21410	Hosne Ara Begum & Sk. Imranul Karim	Adjusted
1203140000076745	Individual	164	Pranjit Kumar Roy	Not adjusted
1203140019847688	Individual	30418	Humayra Marzia Khanom	Not Adjusted
1203140026161289	Joint Holder	80002	Rockshana Parveen & Hasmotrur Rahman	Not adjusted
1203140026161302	Individual	80003	H.A.M Rasiyat	Not adjusted
1203140033864960	Individual	130001	Sheikh Mohammad Moinul Islam	Adjusted

From the above discussion, the Monitoring Team observed that the Company partially rectified the aforesaid non-compliance.

- vi) After randomly scrutinizing, it was revealed that the company provided credit facilities to some employees and relatives of employees several times. Some of which are shown below:

Client Codes	Client Name	Date	Day-end Balance	Remarks
743	Shah Alam & Afroza Binta Harun	15-Oct-08	-97,608.15	Brother of Mr. Md. Mahbulul Alam who is TREC Representative, Manager of Accounts & Authorized Representative of the Company
		15-Dec-09	-86,467.34	
		19-May-10	-471,850.56	
		14-Jun-10	-610,416.59	
		09-Dec-10	-1,184,362.84	
		13-Sep-11	-1,616,450.25	
		17-Dec-12	-1,751,487.35	
		26-Dec-13	-2,407,001.85	
		21-Dec-14	-2,534,535.67	
		06-Dec-15	-2,994,678.39	
		30-Jun-16	-1,735,145.43	
		29-Jun-17	-1,735,595.43	
		28-Jun-18	-1,736,045.43	
		30-Jun-19	-1,736,495.43	

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Client Codes	Client Name	Date	Day-end Balance	Remarks
		30-Jun-20	-1,736,945.43	
		11-Mar-21	-2,018,234.43	
		29-Jul-21	-2,018,684.43	
16006	Mahbuba Amin	29-Sep-10	-160,983.21	Sister of Mr. Md. Mahbulul Alam who is TREC Representative, Manager of Accounts & Authorized Representative of the Company
		30-Nov-10	-420,913.76	
		19-Dec-10	-2,749,909.01	
		22-Mar-11	-2,433,571.93	
		04-Oct-11	-3,325,923.26	
		03-Dec-12	-2,694,395.54	
		17-Dec-13	-2,828,619.53	
		21-Dec-14	-2,312,541.89	
		26-May-15	-2,307,989.09	
		17-Aug-16	-2,244,064.89	
		28-Jun-18	-2,244,914.29	
		30-Jun-19	-2,245,364.29	
		30-Jun-20	-2,245,814.29	
		29-Jul-21	-2,609,946.57	
1972	Md. Akter Hossain	07-Sep-21	-146,210.15	Brother in-law of Mr. Md. Mahbulul Alam who is TREC Representative, Manager of Accounts & Authorized Representative of the Company
		08-Sep-21	-144,905.86	
		09-Sep-21	-188,193.10	
		12-Sep-21	-159,398.26	
		13-Sep-21	-133,870.36	
		14-Sep-21	-142,118.14	
		15-Sep-21	-174,968.54	
		16-Sep-21	-182,700.30	
		19-Sep-21	-146,880.09	
		20-Sep-21	-55,323.57	
		26-Sep-21	-38,653.33	
		05-Oct-21	-11,823.37	
126600	Santo Agro & Trading Farms Ltd	08-Jun-21	-122,475.13	Company of Mr. Rafiqul Islam who is brother of Mr. Md. Mahbulul Alam, TREC Representative, Manager of Accounts & AR of the Company
		09-Jun-21	-136,748.09	
		16-Jun-21	-183,014.39	
		08-Jul-21	-182,336.79	
		13-Jul-21	-219,991.23	
		09-Aug-21	-218,926.78	
		10-Aug-21	-175,896.48	
80002	Rockshana Parveen & Hasmotrur Rahman	02-May-10	-33,911.75	Mr. Md. Hasmothur Rahman is a Manager, Extension Office Branch & Authorized Representative
		17-Aug-10	-2,460,938.89	
		22-Dec-10	-6,210,616.73	
		28-Dec-11	-14,438,559.55	
		13-Dec-p12	-15,703,963.45	
		30-Dec-13	-17,846,973.96	
		24-Dec-14	-21,106,708.85	

# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Client Codes	Client Name	Date	Day-end Balance	Remarks
		30-Dec-15	-25,670,118.66	
		30-Jun-16	-25,916,116.11	
		29-Jun-17	-25,916,566.11	
		28-Jun-18	-25,917,016.11	
		30-Jun-19	-25,917,466.11	
		30-Jun-20	-25,917,916.11	
		29-Jul-21	-30,114,994.65	
80003	H.A.M Rasiyat	13-Mar-11	-35,388.04	Son of Mr. Md. Hasmothur Rahman is a Manager, Extension Office Branch & Authorized Representative
		22-Feb-12	-1,392,764.89	
		30-Dec-12	-589,520.32	
		18-Aug-13	-1,302,224.02	
		30-Jun-14	-781,430.70	
		04-Jul-15	-781,930.70	
		30-Jun-16	-599,411.30	
		29-Jun-17	-599,861.30	
		28-Jun-18	-600,311.30	
		30-Jun-19	-600,761.30	
		30-Jun-20	-601,211.30	
		29-Jul-21	-699,053.24	
164	Pranjit Kumar Roy	13-May-10	-88,162.95	Compliance Officer, Patuatoli Branch
		08-Aug-10	-799,872.27	
		19-Dec-10	-1,678,023.59	
		26-Dec-11	-2,199,978.18	
		30-Dec-12	-2,501,547.71	
		18-Dec-13	-2,849,190.56	
		24-Dec-14	-3,381,754.39	
		30-Dec-15	-2,660,668.56	
		30-Jun-16	-2,643,879.08	
		29-Jun-17	-2,644,329.08	
		28-Jun-18	-2,644,779.08	
		30-Jun-19	-2,645,229.08	
		30-Jun-20	-2,645,679.08	
		29-Jul-21	-3,074,557.38	
21410	Hosne Ara Begum & Sk. Imranul Karim	30-Jun-20	-160,768.36	Mother of Mr. Sheikh Abdullah Al Mamun, In-Charge, Accounts & Authorized Representative
		10-Nov-20	-85,590.53	
		16-Nov-20	-159,718.55	
		19-Nov-20	-152,120.70	
		30-Dec-20	-152,140.70	
		04-Jan-21	-157,145.70	
		04-Feb-21	-158,205.70	
		10-Mar-21	-145,518.30	
		17-Jun-21	-155,838.30	
		12-Aug-21	-158,716.90	



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Client Codes	Client Name	Date	Day-end Balance	Remarks
		01-Sep-21	-138,668.22	
		12-Sep-21	-108,290.96	
		05-Oct-21	-124,491.86	
21389	Sheikh Shafayet Jamil Saudi And Zamila Akther	15-Oct-20	-13,232.58	Brother of Mr. Sheikh Abdullah Al Mamun, In- Charge, Accounts & Authorized Representative
		16-Nov-20	-13,645.88	
		03-Dec-20	-14,286.57	
		30-Dec-20	-16,191.32	
		26-Jan-21	-16,000.95	
		20-Apr-21	-14,819.04	
		27-May-21	-16,832.29	
		18-Aug-21	-38,470.97	
		23-Sep-21	-20,317.70	
23344	Sk. Bahauddin Al-Harun	17-Nov-20	-77,708.14	
		30-Dec-20	-105,933.14	
		20-Jan-21	-202,383.55	
		26-Jan-21	-108,259.04	
		03-May-21	-107,166.56	
		12-May-21	-75,337.13	
30418	Humayra Marzia Khanom	09-Jun-09	-151,202.40	Wife of Mr. Md. Saadat Hossain, Manager of the company
		30-Dec-09	-82,981.44	
		29-Sep-10	-52,141.16	
		30-Dec-12	-637,912.52	
		30-Dec-13	-1,876,253.24	
		10-Dec-14	-1,640,812.78	
		04-Jul-15	-1,630,029.48	
		30-Jun-16	-1,178,376.60	
		29-Jun-17	-1,178,826.60	
		28-Jun-18	-1,179,276.60	
		30-Jun-19	-1,179,726.60	
30-Jun-20	-1,180,176.60			
11-Mar-21	-1,371,242.04			
3187	Shantush Debnath	24-Aug-21	-118,301.84	
		25-Aug-21	-102,081.44	
		29-Sep-21	-44,371.81	
3188	Shantush Debnath & Ganash Paul	10-Oct-20	-162,002.06	Brother of Mr. Suman Chandra Debnath, Authorized Representative of the Company
		30-Nov-20	-153,317.22	
		06-Dec-20	-164,836.42	
		13-Dec-20	-128,182.12	
		30-Dec-20	-162,172.38	
		21-Jan-21	-162,154.49	
		23-Feb-21	-160,931.82	
		08-Mar-21	-234,878.33	
15-Mar-21	-229,743.89			



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Client Codes	Client Name	Date	Day-end Balance	Remarks
		24-May-21	-154,189.67	
		01-Jun-21	-272,315.07	
		07-Jun-21	-269,423.07	
		16-Jun-21	-220,461.64	
		21-Sep-21	-130,258.77	
		04-Oct-21	-46,648.53	
45248	Tania Sultana	10-Oct-20	-331,350.10	Wife of Md. Rashidul Islam, Compliance Officer who is also a brother of Mr. Md. Saiful Islam, Authorized Representative of the Company
		19-Oct-20	-275,663.23	
		28-Oct-20	-348,234.42	
		25-Nov-20	-181,188.12	
		02-Dec-20	-292,886.79	
		14-Dec-20	-308,441.70	
		23-Dec-20	-342,912.37	
		12-Jan-21	-431,932.15	
		27-Jan-21	-334,968.25	
		08-Feb-21	-168,794.90	
		25-Feb-21	-158,797.12	
		03-Mar-21	-215,949.08	
		15-Mar-21	-406,781.73	
		08-Apr-21	-304,015.17	
		20-May-21	-464,112.54	
		24-May-21	-644,488.24	
		14-Jun-21	-290,922.66	
		20-Jun-21	-326,552.06	
18-Jul-21	-147,298.99			
28-Jul-21	-161,418.32			
47675	Md. Nazrul Islam	10-Jun-21	-40,697.71	Brother of Mr. Md. Saiful Islam, Authorized Representative of the company who is also brother of Md. Rashidul Islam, Compliance Officer
		17-Jun-21	-184,796.50	
		22-Jun-21	-169,428.80	
		05-Jul-21	-177,604.34	
		12-Jul-21	-311,123.38	
		03-Aug-21	-339,938.60	
		29-Sep-21	-71,475.27	
105406	Md. Robiul Islam	11-Oct-20	-273,212.21	Brother of Mr. Md. Saiful Islam, Authorized Representative of the company who is also brother of Md. Rashidul Islam, Compliance Officer of the Company
		19-Oct-20	-282,832.89	
		01-Nov-20	-247,405.14	
		08-Nov-20	-278,127.11	
		09-Dec-20	-285,589.84	
		30-Dec-20	-282,484.39	
		12-Jan-21	-279,355.70	
		31-Jan-21	-287,625.19	
		15-Feb-21	-278,328.30	
01-Mar-21	-274,278.73			



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Client Codes	Client Name	Date	Day-end Balance	Remarks
		15-Apr-21	-277,812.55	
		27-Apr-21	-269,592.28	
		27-May-21	-278,702.85	
		13-Jul-21	-258,262.54	
		24-Aug-21	-100,209.32	
105407	Md. Robiul Islam And Nasir Uddin	12-Sep-21	-127,618.28	
		16-Sep-21	-126,596.08	
		19-Sep-21	-36,133.28	
		26-Sep-21	-41,423.68	
202171	Tanvir Ahamed	30-May-21	-118,453.89	Both of Mr. Golam Mohiuddin, Authorized Representative of the Company
		08-Jun-21	-116,387.43	
		11-Aug-21	-100,879.01	
		16-Sep-21	-75,884.74	

Whereas, as per the BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010, "it is further directed that the stock brokers shall not provide margin facilities to any member of the Board of Directors of its own company, officer and staff employed in the company management, their parent, spouse, son, daughter, sister, brother, son-in-law, daughter-in-law and other relatives as per directive issued by the Commission from time to time"

Whereas as per the Section 16(a) of the Securities and Exchange Ordinance, 1969, "No member or associate shall, in contravention of any rules made under this Ordinance, directly or indirectly, (a) extend or maintain credit, or arrange for the extension or maintenance of credit, to or for any person for the purpose of purchasing or carrying any security;"

It appeared that the company violated:

- BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010;
- Section 16(a) of the Securities and Exchange Ordinance, 1969;

by providing credit facilities to some employees and relatives of employees of the company.

**Updated Status:**

After checking and scrutinizing the ledgers of these clients for the period of 01 February 2022 to 31 January 2023, we have found the following:

Client Codes	Client Name	Date	Day-end Balance	Present Status
743	Shah Alam & Afroza Binta Harun	31-Jan-2023	-2,018,684.43	Not Adjusted
16006	Mahbuba Amin	31-Jan-2023	-2,609,946.57	Adjusted
1972	Md. Akter Hossain	01-Feb-2022	-17,346.21	Adjusted
		10-May-2022	-5,654.79	
		25-July-2022	-9,130.42	
		17-Oct-2022	-5,395.47	
		30-Jan-2023	13,890.42	
126600	Santo Agro & Trading Farms Ltd	31-Jan-2023	10,746.49	Adjusted
80002	Rockshana Parveen & Hasmotrur Rahman	31-Jan-2023	-30,114,994.65	Not Adjusted
80003	H.A.M Rasiyat	31-Jan-2023	-699,053.24	Not Adjusted
164	Pranjit Kumar Roy	31-Jan-2023	-3,074,557.38	Not Adjusted
21410	Hosne Ara Begum & Sk. Imranul Karim	13-Nov-2022	-11,403.73	Adjusted
		31-Jan-2023	5,884.60	
21389	Sheikh Shafayet Jamil Saudi And Zamila Akther	07-Jul-2022	-4,324.83	Adjusted
		31-Jan-2023	493.26	
23344	Sk. Bahauddin Al-Harun	31-Jan-2023	14,687.58	Adjusted
30418	Humayra Marzia Khanom	31-Jan-2023	-1,371,242.04	Not Adjusted
3187	Shantush Debnath	31-Jan-2022	38,076.03	Adjusted
3188	Shantush Debnath & Ganash Paul	22-Feb-2022	-3,087.17	
		24-Aug-2022	-18,331.91	
45248	Tania Sultana	31-Jan-2023	1,668.09	Adjusted
47675	Md. Nazrul Islam	03-Feb-2022	4,090.35	Adjusted
		31-Jan-2023	36,292.26	
105406	Md. Robiul Islam	31-Jan-2023	47.88	Adjusted





# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Codes	Client Name	Date	Day-end Balance	Present Status
105407	Md. Robiul Islam and Nasir Uddin	02-feb-2022	-1,085.52	Adjusted
		15-Dec-2022	-86,453.72	
		31-Jan-2023	84,378.20	
202171	Tanvir Ahamed	02-Mar-2022	-7,381.87	Adjusted
		31-Jan-2023	122.41	

From the above discussion, the Monitoring Team observed that the Company partially rectified the aforesaid non-compliance.

### Company-related Findings:

1. The Company preserved list of its Board of Directors, Shareholders, Authorized Representatives and Employees.
2. It was revealed to the Inspection Team that the company conducted only 02 (two) meetings of Board of Directors during the year of 2021.

**Whereas as per section 96 of The Companies Act 1994,** "Meeting of Board: -In the case of every company a meeting of its Board of Directors shall be held at least once in every three months and at least four such meetings shall be held in every year."

**It appeared that the company violated:**

- Section 96 of the Companies Act 1994;
- **by not holding required number of Board Meetings during the respective periods.**

### Updated Status:

The company has held 03 (three) meetings of Board of Directors in the year 2022 whereas as per section 96 of the Companies Act 1994, the company should have held at least 04 (four) meetings in a calendar year. It is also mentionable that the company held all three meetings between August to December 2022, having no meeting held in the first 7 months.

3. It was also revealed to the Inspection Team that the company did not conduct Annual General Meeting (AGM) during the year of 2021.

**Whereas as per sub-section (1) of section 81 of The Companies Act 1994,** "(1) Every company shall in each year of the Gregorian calendar hold in addition to any other meetings a general meeting as its annual general meeting and shall specify the meeting as such in the notices calling it; and not more than fifteen months shall elapse between the date of one annual general meeting of a company and that of the next:"

**It appeared that the company violated:**

- Sub-section (1) of section 81 of The Companies Act 1994

**by not holding Annual General Meeting (AGM) during the respective year.**

### Updated Status:

The company held an Annual General Meeting (AGM) on 22 February 2022, where two directors and the chairman of the company were present. The company has enclosed the minutes of the AGM.

### AML & CFT-related Findings:

1. After analyzing the relevant documents, it was observed that the company did not submit Suspicious Transaction Report (STR) to the BFIU on regular basis.

**Whereas as per the Paragraph 7(8) of BFIU Circular No. 18 dated 19 October, 2015;** "অতিষ্ঠান কর্তৃক ষান্মাসিক ভিত্তিতে সমাপ্ত ষান্মাসিকের রিপোর্টকৃত সকল সন্দেহজনক লেনদেন রিপোর্টের একটি সারাংশ সংশ্লিষ্ট ষান্মাসিক শেষ হওয়ার পরবর্তী মাসের ১৫ তারিখের মধ্যে ইতঃপূর্বে জারীকৃত গাইডলাইনে উল্লিখিত ছক মোতাবেক মহাব্যবস্থাপক, বাংলাদেশ ফাইন্যান্সিয়াল ইন্সটিটিউশন ইউনিট, বাংলাদেশ ব্যাংক, প্রধান কার্যালয়, ঢাকা এর বরাবরে প্রেরণ করতে হবে। উল্লেখ্য, সংশ্লিষ্ট ষান্মাসিকে কোন সন্দেহজনক লেনদেন রিপোর্ট না করলেও শূন্য বিবরণী দাখিল করতে হবে।"

**It appeared that the company violated:**

- Paragraph 7(8) of BFIU Circular No. 18, dated 19 October, 2015.

**by not submitting Suspicious Transaction Report (STR) to the BFIU on regular basis.**

### Non-Submission of Documents/Information In Time

In addition to the above findings, it is mentionable that Sinha Securities Limited couldn't provide required data to the inspection team on that inspection day (Thursday, 23 December 2021) due to server down of their BackOffice Software. They have sent an E-mail to Monitoring and Compliance Department of DSE to inform about their server down at 12:31 a.m. on that inspection day while the inspection team was presented in that company. However, the inspection team collected backup files of the BackOffice Software of the previous day (Wednesday, 22 December 2021).

Later, the inspection team sent an E-mail to Sinha Securities Limited on 06 January 2022 to send 02 (two) officers of the concerned vendor of their BackOffice Software to install the necessary software to extract data from the collected backup files. In this regard, their effective measures were not noticed and they failed to manage the concerned officials of their vendor to come at DSE.



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

The inspection report has been prepared based on the data/information provided by the TREC Holder Company on later date not the spot inspection date.

**Whereas as per** ঢাকা স্টক এক্সচেঞ্জ (অ্যাডমিনিস্ট্রেশন অব ট্রেডিং রাইট এনটাইটেলেমেন্ট সার্টিফিকেট) প্রবিধানমালা, ২০২০ এর ৫(খ); "পরিদর্শন কার্যক্রম পরিচালনায় এক্সচেঞ্জ উহার চাহিদা মোতাবেক প্রয়োজনীয় তথ্য, ইলেকট্রনিক রেকর্ড ও দলিলাদি যৌক্তিক সময়ের মধ্যে সরবরাহ করিতে ট্রেডহোল্ডারদিককে নির্দেশ প্রদান করিতে পারিবে এবং ট্রেডহোল্ডারগণ উহা প্রদানে বাধ্য থাকিবে।"

**It appeared that the company violated:**

- ঢাকা স্টক এক্সচেঞ্জ (অ্যাডমিনিস্ট্রেশন অব ট্রেডিং রাইট এনটাইটেলেমেন্ট সার্টিফিকেট) প্রবিধানমালা, ২০২০ এর ৫(খ);

**by not submitting information/documents in time.**

**Updated Status:**

The company has submitted Suspicious Transaction Report (STR) to the BFIU for the period of July 2022 – December 2022.

যেহেতু, উপযুক্ত আলোচ্য বিষয়ে আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ২৬, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/২৯১৬/২০২০/৬৭৭ স্মারকমূলে Sinha Securities Limited -কে মে ১৯, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mr. Golam Mohiuddin and Mr. Sonjoy Kumar Roy, Sinha Securities Limited এর পক্ষে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With reference to your letter No. BSEC/Enforcement/2916/2020/677 dated April 26, 2022 on the above-mentioned subject. It can be mentioned that Sinha Securities Limited has started this business since 1964 with good reputations & fame for last several years. In this regard it can also be mentioned here that after 2010 the capital market started falling drastically. But we borrow the loan from different Bank and Financial Institution's to provide the margin loan to different clients. We are paying interest to Bank against that loan in regular basis but we are not getting/charging any interest from them. Because most of clients having negative equity.

Due to covid-19 pandemic situation the whole world economy suffered and got huge loss, most of the countries government is giving support to boost up their economy. We also suffered like others. It is mentioned here that April/20 & May/20 were also closed the share market. Due to the above reasons, we have incurred a heavy loss.

On the other hand, the expenditure was gradually increased but income of the house was almost nil. The clarifications are as follows: -

**(1) Regarding opened more than one individual and joint BO accounts of some single clients:**

In this context, we have already closed all your required joint and individual BO accounts (Sheet enclosed). We will alert in future for BO open either single and joint

**(2) Regarding BO accounts in the name of Authorized Representative:**

Mr. Mohammad Iqbal Bhulyan & Mr. Md. Main Uddin Bhulyan code No-54588, 54587 already withdraw Authorized Representative dated 31 August 2021 (Sheet enclosed) and S.M. Ezazul Haque & Sagar Ahmed code No-152658 already closed (sheet enclosed). Rockshana Parveen & Hasmotur Rahman will be withdraw their Authorized Representative immediately. Mr. Sheikh Abdullah Al Mamun and Ms. Tania Sultana & Md. Saiful Islam (Code No. 23640 and 45247) will be close their accounts immediately. We are sorry for these type of BO accounts maintaining. So, we will alert in future.

**(3) Regarding same phone number of one Authorized Representative:**

We have discussed with CDBL In-charge and Authorized Representative for open BO with same phone number. They are extremely sorry for that BO Actually it is posting mistake. We have already rectified of all phone number and posted correctly (Sheet enclosed).

**(4) Regarding cash payment to clients:**

We are sorry for this type of transaction to made payment by cash. We would like to inform you that we will alert in future for this type of transaction.

In this context we are maintaining 38,000 (approx.) BO accounts and 11 branches. So, it is mentioned here that some valued clients have taken cash in their portfolio in their request However we will alert in future.

**(5) Regarding some margin clients who were not eligible:**

We have been given margin since 2010. We did not know who were not eligible for margin. So, we are trying to adjust the margin and alert in future for this type of transaction.

# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

## (i) Regarding credit facilities to some employees and relatives of employees:

We would like to inform you that we did not know to provide margin facilities to employees. We are sorry for violation of BSEC rules to provide credit facilities of some employees. We are trying to recovery this margin. In this context we have already adjusted code No-21389, 21410, 23344, 105406, 105407, 126600, 202171, 1972, 3187, 3188, 45248, 47675 and code No- 30418 (Margin- sheet enclosed).

## (7) Company related findings:

(i) We have preserved list of Directors, shareholders, Authorized Representatives and employees (sheet enclosed).

## (ii) Regarding Board of Directors meeting:

We have completed 02 (two) Board of Directors meeting. Due to Covid-19, we cannot arrange Board of Directors meeting. Because 02 (two) Directors were outside of Bangladesh for their treatment for a long time. So, we are extremely sorry for not arrange the meeting. We will alert in future and we will properly maintain from now.

## (iii) Regarding AGM during the year 2021:

We would like to inform you that our annual report was not finalized in that time. Now the Audit report finalized and report already submitted to DSE and also completed AGM (copy enclosed).

## (8) Regarding AML & CFT related findings:

We are not submitting STR to BFUI in proper time. We are sorry for that report. We have already submitted to Bangladesh Bank (copy enclosed).

Your Sympathetic consideration in these regards would highly be appreciated.”

যেহেতু, Sinha Securities Limited -এর উপর্যুক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক সেহেতু এক্ষেত্রে Sinha Securities Limited -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Sinha Securities Limited -এর উপর্যুক্ত কর্মকাণ্ডের ফলে এটা প্রতীয়মান হয় যে, Sinha Securities Limited নিম্নোক্ত বিধানাবলী লঙ্ঘন করেছে:

- ডিপজিটরি (ব্যবহারিক) প্রবিধানমালা, ২০০৩ এর প্রবিধান ২৬(১)

by maintaining more than one individual and joint BO Accounts of the aforesaid single clients.

- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০-এর বিধি ৪(২)(৪) এর Deed of Agreement, clause-5

by maintaining Customer and BO accounts in the name of some Authorized Representatives of the company.

- BSEC circular no. বিএসইসি/সিডিএস/১০/২০১৬/৪৩৫ তারিখ জুন ২০, ২০১৯;

by opening several BO Accounts of different clients using the same mobile number of an Authorized Representative.

- Rule 6(1) of the Securities and Exchange Rules, 2020;
- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১;
- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর দ্বিতীয় তফসিল এর আচরণ বিধি ১।

by making cash payments to some clients of the Company.

- BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010.

by executing margin agreements with the employees and relatives of employees of the Company.

- BSEC Directive No. SEC/CMRRCD/2001-43/31 dated 23 March 2010;
- Section 16(a) of the Securities and Exchange Ordinance, 1969;

by providing credit facilities to some employees and relatives of employees of the company.

- ঢাকা স্টক এক্সচেঞ্জ (অ্যাডমিনিস্ট্রেশন অব ট্রেডিং রাইট এনটাইটেলমেন্ট সার্টিফিকেট) প্রবিধানমালা, ২০২০ এর ৫(খ);

by not submitting information/documents in time.

যেহেতু, Sinha Securities Limited -এর উল্লিখিত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 and সেকশন 18 of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ as well as সেকশন ১৫ of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন ডিপজিটরি আইন, ১৯৯৯ অনুযায়ী শাস্তিযোগ্য অপরাধ;



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

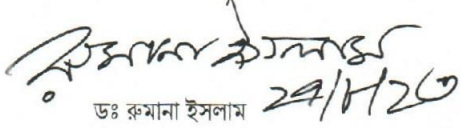
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Sinha Securities 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, and সেকশন 18 of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ as well as সেকশন ১৫ of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন ডিপজিটরি আইন, ১৯৯৯ এ প্রদত্ত ক্ষমতাবলে-

- Sinha Securities Limited -কে ০৫ লক্ষ টাকা (পাঁচ 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, উক্তরূপ ব্যর্থতা অব্যাহত থাকলে অনুরূপ অব্যাহত থাকাকালীন প্রতিদিনের জন্য ১০ (দশ) হাজার টাকা অর্ধদণ্ডে দণ্ডিত হবেন মর্মে সিদ্ধান্ত গৃহীত হয়। অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

  
ডঃ রুমানা ইসলাম 29/11/20  
কমিশনার।

বিতরণ:

১। Managing Director/CEO  
Sinha Securities Limited  
(DSE TREC Holder NO: 067)  
Rahman Mansion (3rd Floor, West Side),  
161, Motijheel C/A, Dhaka-1000.