বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

নং-বিএসইসি/এনফোর্সমেন্ট/২২০১/২০১৪/২৯৮ তারিখঃ ১৩ জুলাই ২০১৫ ইং

আদেশ

যেহেতু, কমিশন এর আদেশ নং BSEC/Surveillance/2014-0840/427 dated 9th November 2014 এর মাধ্যমে একটি তদন্ত কমিটি গঠিত হয় এবং উক্ত তদন্ত কমিটির দাখিলকৃত প্রতিবেদন অনুযায়ী findings and contraventions নিম্নরূপ:

Quote

"----10. From collected documents it appeared that Prime Finance Capital Management Limited bought in their two own portfolio maintained with PFI Securities Ltd. (client Code 1170) and Prime Islami Securities Limited (client Code 228). From their transaction report it appeared that during 20th July to 16th November 2014 they bought 8,90,200 shares average price Tk.137.16 and sold 4,05,000 average price Tk.188.78 of SPCL through PFI Securities Ltd. and bought 5,01,000 shares average price Tk.140.75 and sold 41,000 average price Tk.240.51 of SPCL through Prime Islami Securities Limited respectively. Mentionable that as on 13th November 2014 in their clients' account total held 5,60,600 shares of SPCL Thus, during 15th July to 16th November 2014 Prime Finance Capital Management Limited total bought 13,91,200 and sold 4,46,000 shares through their own portfolio. Thus Prime Finance Capital Management Limited directly with their own portfolio, own portfolio of common interest/director company and indirectly through their clients' portfolio created extreme buy pressure in the market and completed their purchase of major part of the tradable shares accordingly freezing the same, by which created supply shortage of tradable share in the market compare to demand. As a result share price of SPCL go up shortly and reached at Tk.338.80 on 18/11/2014. As such, Prime Finance Capital Management Limited directly and indirectly help to others has been creating fake market by employing unlawful tactics regarding share price of SPCL for their self interest and made huge amount of realized and unrealized capital gain.

Contravention: Through the aforesaid activities **Prime Finance Capital Management Limited** has contravened বিধি ৩৫ (২) (ঢ) and (ণ) of সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (মার্চেন্ট ব্যাংকার ও পোর্টফোলিও ম্যানেজার) [১]বিধিমালা], ১৯৯৬.

13. As per Commission's Directive NoSEC/CMRRCD/2009-193/136 dated September 30, 2012 Merchant Banker & Portfolio Manager may extend maximum limits of credits facilities to their approved clients on 1:0.5 basis i.e. 50% of clients' margin/deposit. Thus no member shall be permitted deficit arising from transactions 50% of clients' equity. But, Prime Finance Capital Management Limited permitted debit balance (deficit) excess of highest limit 50% of clients' equity. Mentionable that Prime Finance Capital Management Limited allowed SPCL as margin able security although SPCL as non margin able security. As on 02/11/14 a client, Syed Golam Wadud, Tanipa Begum (who buy and held SPCL share) are stated below whom debit balance exceed the maximum limit:

Client Code	Name	Quantity of SPCL	Debit Balance (Taka)	Equity
433	Syed Golam Wadud, Tanipa Begum	100000	4899973	5426095

Contravention: Through the aforesaid activities **Prime Finance Capital Management Limited** has contravened Commission's Directive NoSEC/CMRRCD/2009-193/136 dated September 30, 2012.

20. Trading of shares of Shahjibazar Power Company Limited (SPCL) has been commenced at the stock exchanges on 15th July 2014. After listing, first phase during 15th July 2014 to 10th august 2014, share price SPCL increased by 144% (from Tk.36.50 to Tk.89.20) where as DSEX Index had been increased by 3.85% (from 4362.78 to 4530.83). Thus, the share price of the company increased 37 times more than the increase of DSEX Index. Thus, the first phase price increasing trend of SPCL seemed manipulative and significant. Due to abnormal price hike and Commission's investigation, Exchanges suspended the trading of SPCL shares from 11th August 2014 for the greater interest of investors and capital market. During the first phase, directly the following clients' created extreme buy pressure of the said share in the market and completed their purchase of major part of the tradable shares, by which created supply shortage of tradable share compare to demand as a result price go up shortly and made huge amount of realized and unrealized capital gain:

Sl No.	Broker Name	Client Code	Client Name	Buy Volume	Sell Volume
1	Shahed Securities Ltd.	180	Aleya Begum	650200	505200
2	Sharp Securities Ltd.	1216	Mozammel Haque Bhuiyan	584200	398800
3	Shahed Securities Ltd.	188	Md. Ali Akbar	480000	360000
4	Prime Islami Securities ltd.	325	GETCO Telecommunication Ltd.	389400	0
5	AIBL Capital Market Services Ltd.	666	Gulam Mustafa	283000	52000
6	Popular Equities Ltd.	I231	Mozammel Haque & Nargis Akter	250000	150000
7	City Brokerage Ltd.	M344	Muhammad Abdur Razzaque	236400	4200
8	Sheltech Brokerage Ltd.	S001	Habibur Rahman	217600	139200
9	IFIC securities Ltd.	2772	Yeakub Ali Khandaker	210000	0
10	Mondol Securities Ltd.	240	Mondol Fabrics Ltd.	200400	200400

It was found that Mr. Md. Ali Akbar total bought 11,30,200 and sold 8,65,200 of SPCL shares through his two accounts maintained with Shahed Securities Limited in his own name and his mother name (Aleya Begum) and Mozammel Haque Bhuiyan total bought 8,34,200 and sold 5,48,800 of SPCL shares through his two accounts maintained with Sharp Securities Ltd. and Popular equities Ltd. (client of AB Investment Ltd.).

After suspension, trading of SPCL resumed on 20th October 2014. After resumption of trading, second phase started to increase price of SPCL from Tk.89.20 to Tk.338.80 during 19th October 2014 to 16th November 2014. Hence, in second phase during the said period, share price SPCL increased by 280% although DSEX Index has been decreased by 4.11% (from 5176.75 to 4963.90). Thus, in second phase price increasing trend of SPCL seems more suspicious and manipulative. In two phases, directly and indirectly the following parties created extreme buy pressure of the said share in the market after completed their purchase of major part of the tradable shares freezing the same to create artificial supply shortage of tradable share compared to demand as a result price go up shortly and made huge amount of realized and unrealized gain. Summary of their trading are given below:

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

Summary statement of top significant involving parties

Broker Name	Client code	Client Name	Buy Quantity	Sale Quantity	Balance	Realized Gain	Unrealized Gain
PISL(Dealer A/c		Prime islami securities ltd.	1107600	-	1107600	-	132300482
PISL	325	Getco Tele Communication Ltd.	661200	-	661200	-	122582426
PISL	228	PFCML	501000	201000	300000	31426285	34155201
PISL	520	Star Sharebazar Ltd.	450000	-	450000	-	80922000
AIBL Capital		Golam Mustafa	397200	52000	345200	-	65071931
Prime Bank Inv. Ltd.	255	Nasima Akter Lata	211800	-	211800	-	38843964
Vision Capital Magt. Ltd.	9421	Nasima Akter Lata	44000	-	44000	-	8056400
PFI Securities Ltd.	1170	PFCML	890200	455000	435200	29596638	51108212
PFI Securities Ltd.	1623	PFCML-EPF	2000	-	2000	-	247080
PFI Securities Ltd.		PFI Securities Ltd.(dealer)	83000	-	83000		
PFI Securities Ltd.		PFI Securities Ltd.-EPF	50000	-	50000		
PFI Securities Ltd.	1608	Amzad Hossain Fakir	352600	352600	-	25536168	-
Shaheed Securities Ltd.	188	Ali Akbar	495000	495000	-	7623200	-
Shaheed Securities Ltd.	180	Aleya Begum	650200	650200	-	16019270	-
Sharp Securities Ltd.	1216	Mozammel Haque Bhuiyan	584200	584200	-	24787876	-
AB Investment Ltd.	231	Mozammel Haque & Nargis Akter	250000	250000	-	6118000	-
BLI Capital Ltd.	B665	Abul Kalam Eajdani	100000	-	100000	-	19048000
AIBL CMS Ltd.	2473	Abul Kalam Eajdani	40000	-	40000	-	7696000
PFI Securities Ltd.	1620	Abul Kalam Eajdani	41000	-	41000	-	7808860

Detailed trade report of all involving parties are given in the **Appendix-A & B** of the report regarding buy quantity, sale quantity, average buy price, average sell price, realized and unrealized gain. Mentionable that unrealized gain is calculated based on price of SPCL of Tk.254.60 on 25th November 2014.

Considering above findings Prime Islami Securities limited, PFI Securities Limited and Prime Finance Capital Management Limited directly and indirectly with their clients' through acting or practicing or engaging in a course of unlawful business like as misstatement, violating single security exposure, single client exposure, excess margin loan, loan given to non-margin able security, creating artificial or fake market by employing unlawful tactics for their self interest etc. for purpose of turning to their advantage by manipulating share price of SPCL.

Involving parties bought a total 95,57,200 shares during the said period. Through the manipulating share price of SPCL, they made a total realized gain of Tk.23,80,99,574 and unrealized gain of Tk.81,36,50,143 within the short span of time.

Contravention: Through the aforesaid activities **Prime Finance Capital Management Limited** has contravened Section 17 (e) (v) of Securities and Exchange Ordinance, 1969.**"Unquote**

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Ahm

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

যেহেতু, কমিশন উপরোল্লিখিত প্রতিবেদন অনুযায়ী সিকিউরিটিজ আইন পরিপালনে ব্যর্থতার জন্য প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড এর বরাবরে একটি show-cause-cum-hearing notice সূত্র নং- SEC/Enforcement/2201/2014/717 তারিখ ডিসেম্বর ২১, ২০১৪ ইং প্রেরণ করে এবং জানুয়ারি ০৭, ২০১৫ ইং তারিখে শুনানীর দিন ধার্য্য করে এবং যা পরবর্তীতে কমিশনের ০৪/০২/২০১৫ ইং তারিখের পত্রের মাধ্যমে ২৩/০২/২০১৫ ইং তারিখে শুনানীর দিন ধার্য্য করা হয়। ধার্য্যকৃত তারিখে প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড এর প্রতিনিধি উপস্থিত হয়ে ফেব্রুয়ারি ২৩, ২০১৫ ইং তারিখের পত্রের মাধ্যমে লিখিত বক্তব্য দাখিল করেন। যাতে অন্যান্যের মধ্যে, নিম্নোক্ত বিষয়গুলির উল্লেখ আছেঃ-

"-------We provide with the reply (as per serial no. of enquiry report) to the said show cause notice as below:

Serial No. 10

In the show cause notice it has been alleged that Prime Finance Capital Management Limited directly with their own portfolio, own portfolio of their common interest/director of the Company and indirectly through their client's portfolio created extreme buy pressure in the market and completed their purchase of major part of tradable shares of Shahjibazar Power Company Limited (SPCL) accordingly freezing the same, by which created supply shortage of saleable share in the market compared to demand and contravened *বিধি ৩৫ (২) (চ)* and *(ণ)* of *সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (মার্চেন্ট ব্যাংকার ও পোর্টফোলিও ম্যানেজার) বিধিমালা, ১৯৯৬*.

In this connection, we would like to provide the following information in investing in shares of SPCL. After analyzing the prospectus and other pertinent information we have found that:

- SPCL has set up 86 MW gas fired power plant and started commercial production on 10 February 2009. The total production (electricity) of the Company will be sold solely to the Bangladesh Power Development Board (BPDB) as per 15 years Power Purchase Agreement (PPA). So, it can be mentioned that BPDB is only the customer of the Company which is a government entity and the revenue is so far secured by the guarantee provided by the BPDB.
- It has been revealed from the prospectus that Petromax Refinery Limited, a fully owned subsidiary Company, produces petroleum and petrochemicals like diesel, octane and kerosene from gas condensate. The Petromax Refinery started its operation on 14 September 2013 which would help in earning the revenue as well as building the Net Asset Value (NAV) of SPCL.
- It has also been revealed from the prospectus that Midland Power Company Limited, 49% owned associate Company, 51 MW gas fired power plant, started its commercial operation on 6 December 2013 which may have positive impact in increasing the net profit and NAV of the SPCL. Again the BPDB is only the customer of the total production of electricity produced by this associate Company of SPCL.

After analyzing the news published in the DSE website we have observed that:

- On 15 July 2014 and 20 October 2014, SPCL reported its revised Price Sensitive Information (PSI) mentioning its Basic EPS for the 3rd Quarter (January 2014-March 2014) of Tk. 1.46 against Tk. 0.78 for the same period in January 2013-March 2013. Considering this PSI, EPS of 3rd Quarter (January-March 2014) has been increased by 87.18% compared to the EPS of the same period in the previous year.
- Furthermore, the Company also reported its next PSI that it's Basic EPS for the 9 months (July 2013-March 2014) of Tk. 1.48. Besides, the Company reported its 12 months (July 2013-June 2014) EPS of Tk. 4.13. From this PSI, it has been observed that 4th Quarter (April 2014-June 2014) basic EPS has been increased by 179% as compared to 9 Months (July 2013-March 2014) EPS. At this point, 4th Quarter EPS was also indicating a future prospect.
- On 3 November 2014, the Company declared 25% cash and 5% stock as dividend for the year ended on 30 June 2014. According to DSE website and SPCL's prospectus it is also evident that its basic EPS was Tk. 2.32 and Tk. 4.13 respectively in the accounting year 2013 and 2014. Here it has been observed that EPS in 2014 increased by 78.02% compared to same period of previous year.

- On 16 November 2014, the Company further reported its Basic EPS for the 1st Quarter (July 2014-September 2014) of Tk. 2.36 and Tk. 0.51 for the same period of the previous year, having growth of 362.74% against the same period in the previous year which indicates huge growth prospect the Company.
- Investment in own portfolio is one of the regular activities of a Merchant Bank i.e. buying and selling of securities upon research and analysis of a particular share as well as overall market after following the short term and long term investment strategies of the Merchant Bank. It is observed from our transaction statement that we bought and sold the SPCL shares during the period as normal activities of our operation. It can be noted from the Appendix – A & B attached with your enquiry letter that we have bought 13,93,200 shares and sold 6,56,000 shares (47.08% of total buy) of SPCL during 20 July 2014 to 17 November 2014 in our own portfolio bearing no. 1170 and 228 and EPF portfolio no. 1623. It may kindly be informed that still we are in a process of selling the SPCL shares.

As such it is clear that all transactions with regard to SPCL shares took place based on data and materials published and available publicly. Such transactions were done based on the data and PSI which were made available by SPCL.

Above data indicates we did not involve in freezing the shares of SPCL, creating supply shortage as we were involved ourselves in continuous buying and selling of SPCL shares like normal investment activities in our own portfolio.

In view of the above, it is evident that we have made the investment in SPCL shares during our normal course of business based on analysis, disclosed PSI and our long & short term investment strategies complying all relevant laws and regulations. So, it can be said that we were not involved ourselves in any activities as mentioned in rule বিধি ৩৫ (২) (চ) and (ণ) of সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (মার্চেন্ট ব্যাংকার ও পোর্টফোলিও ম্যানেজার) বিধিমালা, ১৯৯৬.

Serial No. 13

In the show cause notice it has been alleged that Prime Finance Capital Management Limited allowed SPCL as marginable security although it was non marginable security and contravened the Commission's Directive No. SEC/CMRRCD/2009-193/136 dated 30 September 2012. In this connection, we would like to explain our position as follows:

- As per portfolio statement dated 02 November 2014 it was evident that we did not violate margin rule in purchasing the shares of SPCL. Mr. Syed Golam Wadud & Tanipa Begum (client code: 0433) did not buy any SPCL shares on that day. In this connection we have attached the following information of client code no. 0433 for your kind reference:
  - Summary of purchase and relevant information
  - Portfolio Statement for the day immediately preceding the SPCL buying date
  - Portfolio Statement on 2 November 2014
  - Transaction Statement for the period from 15 July 2014 to 30 November 2014
  - Financial Statement for the period from 15 July 2014 to 30 November 2014
- It may be observed from the attached documents that the said investor (client code: A0433) purchased SPCL shares during 17 July 2014 to 10 August 2014 within the limit of margin ratio and did not purchase any share of SPCL after 10 August 2014.

Thus, it is evident that we did not contravene the Commission's Directive No. SEC/CMRRCD/2009-193/136 dated 30 September 2012.

Serial No. 20

Enquiry Committee has further alleged in serial No. 20 of its report that Prime Finance Capital Management Limited, with other individual and institutional investor directly and indirectly with the clients', through acting or practicing or engaging in a course of unlawful business like as misstatement, violating single security exposure, single client exposure, excess margin loan, loan given to non-marginable security, creating artificial or fake market by employing unlawful tactics has contravened Section 17 (e) (v) of the Securities and Exchange Ordinance, 1969. In this regard, our position is given below:

- In case of SPCL, the management of the Company observed that it was a prospective security. Whenever the IPO of SPCL debuted in capital market, our portfolio department as well as research team analyzed its fundamental data from the prospectus and found that the investment in SPCL's shares would be good yielding investment.
- According to Appendix A (appended with BSEC letter), transaction statement of Prime Finance Capital Management Limited (Client Code: 1170) during the aforementioned period from 20 July 2014 to 17 November 2014, it is construed that total trade volume of Client Code: 1170 was only 3.05% as compared to DSE and CSE total trade volume of SPCL. This amount was very minimal to influence the price of SPCL during the said period.
- As we follow investment strategy like short, mid and long term investment; we have invested in SPCL from very inception of its debut in IPO as it possessed some prospective information. Initially, we traded (buy/sale) shares of SPCL continuously following a short and mid term investment strategy in the first phase of investment and realized the gain in normal course of business. In second phase, we further invested in SPCL, as year-end (July 2013 - June 2014) EPS has been increased to Tk. 4.13 and also the Company declared 25% cash dividend and 5% stock dividend.
- Similarly, we purchased 5,01,000 and 2,000 shares of SPCL in our another portfolio accounts namely Prime Finance Capital Management Limited (Client Code: 228) and Prime Finance Capital Management Limited (EPF) (client code: 1623) respectively and sold 2,01,000 shares of SPCL from the Prime Finance Capital Management Limited (client code: 228) over the specified period, which was normal part of our daily transaction. Total trade volume of SPCL in client code: 228 and client code: 1623 were 4.08% and 0.07% respectively as compared to DSE and CSE total share volume of SPCL over the time span, which was also very insignificant.

In consideration of the above, it is apparent that we have made the investment in SPCL shares after analyzing the prospectus and projecting the financial statements. It also evident the investment in SPCL was normal part of our daily transaction which does very little impact on price. The short, mid and long term investment strategies of the Company is complying all relevant laws and regulations. So, it is observed that we did not involve in manipulating the share price of SPCL and did not contravene the rules mentioned in Section 17 (e) (v) of the Securities and Exchange Ordinance, 1969.

It is also submitted that there was no deliberate and/or clear contravention of any securities law on our part.

In the circumstances, we hope and pray that the above explanation would sufficient to satisfy you to come to a conclusion that there was no violation on our part of *বিধি ৩৫ (২) (চ)* and *(ণ)* of *সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (মার্চেন্ট ব্যাংকার ও পোর্টফোলিও ম্যানেজার) বিধিমালা*, ১৯৯৬, Commission's Directive No. SEC/CMRRCD/2009-193/136 dated 30 September 2012 and Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 and accordingly, we hope and pray that we may be absolved from the charges brought against us and also from any further measures under any charges thereof."

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

যেহেতু, প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড তারিখ ফেব্রুয়ারি ২৩, ২০১৫ ইং পত্রের মাধ্যমে উল্লিখিত ব্যর্থতা তথা বিধি বিধান লংঘন সংক্রান্ত অভিযোগ স্বীকার করে যে লিখিত ব্যাখ্যা প্রদান করেছে তা কমিশনের নিকট গ্রহনযোগ্য বলে বিবেচিত হয়নি এবং প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড এর উক্ত লংঘন ইচ্ছাকৃত;

যেহেতু, সিকিউরিটিজ সংক্রান্ত উল্লিখিত আইন ও উহার অধীন জারিকৃত বিধি-বিধান পরিপালনে প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড এর উক্তরূপ ব্যর্থতা section 22 of the Securities and Exchange Ordinance, 1969 এর অধীন শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন পরিপালনে উল্লিখিত ব্যর্থতার জন্য, তথা পুঁজিবাজারের উন্নয়নের পাশাপাশি বাজারের শৃংখলা ও স্বচ্ছতা রক্ষার স্বার্থে প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড কে জরিমানা করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন, উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এ প্রদত্ত ক্ষমতাবলে প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড এর উপর ২০ (বিশ) লক্ষ টাকা জরিমানা ধার্য্য করল যা অত্র আদেশের তারিখ হতে ১৫ (পনের) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে কমিশনে জমা করতে হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

13/7/15

মোঃ আঃ সালাম সিকদার
কমিশনার

বিতরনঃ
প্রাইম ফাইন্যান্স ক্যাপিটাল ম্যানেজমেন্ট লিমিটেড ।
প্রধান নির্বাহী কর্মকর্তা, ঢাকা ষ্টক এক্সচেঞ্জ লিমিটেড।
প্রধান নির্বাহী কর্মকর্তা, চট্টগ্রাম ষ্টক এক্সচেঞ্জ লিমিটেড।

অবগতির জন্য অনুলিপিঃ

১। নির্বাহী পরিচালক, আইন, বিএসইসি।
২। নির্বাহী পরিচালক, সার্ভেইল্যান্স, বিএসইসি।
৩। নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৪। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

Name of the broker: PFI Securities Limited
Client Code:1170
Client Name:Prime Finance Capital Management Limited

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume DSE+CSE	Trade volume Client buy	Trade volume Client Contribution
20-Jul-14	36,200	49.67	1,798,054			0	2,527,800	36,200	1.43%
21-Jul-14	63,800	51.16	3,264,008			0	3,128,000	63,800	2.04%
22-Jul-14	10,000	56.62	566,200			0	1,944,200	10,000	0.51%
24-Jul-14			0	110,000	58.58	6,443,800	2,829,200	0	0.00%
4-Aug-14	50,000	62.63	3,131,500			0	3,122,000	50,000	1.60%
6-Aug-14	50,000	72.76	3,638,000			0	1,917,200	50,000	2.61%
7-Aug-14	100,000	78.39	7,839,000			0	2,068,400	100,000	4.83%
10-Aug-14	30,000	89.38	2,681,400			0	1,206,000	30,000	2.49%
20-Oct-14	63,400	98.30	6,232,220			0	782,600	63,400	8.10%
23-Oct-14	174,800	130.75	22,855,100			0	2,668,600	174,800	6.55%
27-Oct-14	12,200	158.22	1,930,284			0	100,400	12,200	12.15%
29-Oct-14	20,000	191.08	3,821,600			0	260,200	20,000	7.69%
3-Nov-14	47,600	185.57	8,833,132			0	934,200	47,600	5.10%
5-Nov-14			0	48,000	202.49	9,719,520	647,600	0	0.00%
6-Nov-14			0	50,000	220.16	11,008,000	120,400	0	0.00%
9-Nov-14			0	50,000	239.42	11,971,000	863,400	0	0.00%
10-Nov-14	114,400	219.24	25,081,056			0	746,800	114,400	15.32%
11-Nov-14	17,800	225.77	4,018,706			0	644,800	17,800	2.76%
12-Nov-14			0	107,000	241.81	25,873,670	523,200	0	0.00%
13-Nov-14	100,000	264.13	26,413,000			0	216,200	100,000	46.25%
16-Nov-14			0	40,000	286.03	11,441,200	121,000	0	0.00%
17-Nov-14			0	50,000	310.98	15,549,000	1,815,400	0	0.00%
Total	**890,200**	**137.16**	**122,103,260**	**455,000**	**202.21**	**92,006,190**	**29,187,600**	**890,200**	**3.05%**
Realized gain(Tk.)						**29,596,638**			
Realized gain(%)						**47.42%**			
Market closing price as on 25-Nov-14						**254.60**			
Unrealized gain(Tk.)						**51,108,212.12**			
Unrealized gain(%)						**85.62%**			

Appendix-A

ফোন (পিএবিএক্স) : +৮৮০-২-৯৫৬৮১০১-২, +৮৮০-২-৯৫৬১৫২৫, ফ্যাক্স : +৮৮০-২-৯৫৬৩৭২১, ই-মেইল : secbd@bdmail.net, ওয়েব : www.secbd.org, www.sec.gov.bd

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
জীবন বীমা টাওয়ার (১৫, ১৬, ১৭ ও ২১তম তলা), ১০ দিলকুশা বা/এ, ঢাকা-১০০০, বাংলাদেশ।

Name of the broker: PFI Securities Limited
BOID :
Client Code: 1623
Client Name: Prime Finance Cap. Mgt. Ltd. EPF

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume		
							DSE+CSE	Client buy	Client Contribution
23-Oct-14	2,000	131.06	262,120			0	2,668,600	2,000	0.07%
Total	2,000	131.06	262,120	0	N/A	0	2,668,600	2,000	0.07%
Realized gain(Tk.)						N/A			
Realized gain(%)						N/A			
Market closing price as on 25-Nov-14						254.60			
Unrealized gain(Tk.)						247,080.00			
Unrealized gain(%)						94.26%			

Appendix-A

ফোন (পিএবিএক্স) : +৮৮০-২-৯৫৬৮১০১-২, +৮৮০-২-৯৫৬১৫২৫, ফ্যাক্স : +৮৮০-২-৯৫৬৩৭২১, ই-মেইল : secbd@bdmail.net, ওয়েব : www.secbd.org. www.sec.gov.bd

Name of the broker: Prime Islami Securities Limited
Client Code:00228
Client Name: Prime Finance Capital Management Limited

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value		Trade volume: DSE+CSE	Trade volume: Client buy	Trade volume: Client Contribution
4-Aug-14	40,600	61.54	2,498,524			0		3,122,000	40,600	1.30%
6-Aug-14	9,400	73.10	687,140			0		1,917,200	9,400	0.49%
23-Oct-14	350,000	130.40	45,640,000			0		2,668,600	350,000	13.12%
2-Nov-14	101,000	214.75	21,689,750			0		1,360,600	101,000	7.42%
9-Nov-14			0	31,000	239.90	7,436,900		863,400	0	0.00%
12-Nov-14			0	10,000	242.40	2,424,000		523,200	0	0.00%
17-Nov-14			0	160,000	311.60	49,856,000		1,815,400	0	0.00%
Total	**501,000**	**140.75**	**70,515,414**	**201,000**	**297.10**	**59,716,900**		**12,270,400**	**501,000**	**4.08%**
Realized gain(Tk.)						**31,426,285**				
Realized gain(%)						**111.08%**				
Market closing price as on 25-Nov-14						**254.60**				
Unrealized gain(Tk.)						**34,155,201.20**				
Unrealized gain(%)						**80.89%**				

Appendix-A