

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/৮৬৬

তারিখঃ নভেম্বর ০৪, ২০২৪

APOLLO TRADING LIMITED

(BO ID: 1605400069100429)

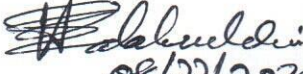
131, New Eskaton Road

Ramna, Dhaka

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/৮৬৫ তারিখঃ নভেম্বর ০৪, ২০২৪ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


০৪/১১/২০২৪

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/MSI/2021-1009/Vol-2 dated 19.09.2022]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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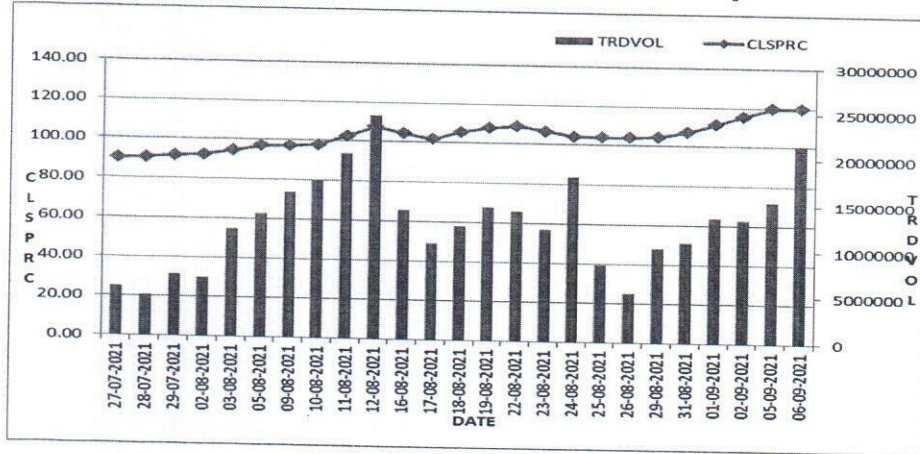
তারিখঃ নভেম্বর ০৪, ২০২৪

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, সেপ্টেম্বর ১২, ২০২১ তারিখের DSE Surveillance Note # 055/2021 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 ২৮.০৭.২০২১ থেকে ০৬.০৯.২০২১ পর্যন্ত সময়কালে Bangladesh Export Import Company Ltd. (BEXIMCO)-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 "BEXIMCO" in public market



YCP of BEXIMCO as on 28-07-2021 was Tk. 90.00 and closing price of the same was Tk. 119.80 as on 06-09-2021. During this period the investigation team found that the price of BEXIMCO share was increased by Tk. 29.80 which is approximately 33.11% higher compared to Close Price of 27-07-2021.

Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates:

Observation-1:

Momtazur Rahman (client code # J3463 & BOID # 1605400019678719 of Janata Capital and Investment Limited (traded through ICB Securities Trading Company Limited)) was the 6th buyer of shares of "BEXIMCO" from the period of 28.07.2021 to 06.09.2021. His brother, Mosfequr Rahman (client code # J3461 & BOID # 1605400019678794 of Janata Capital and Investment Limited (traded through ICB Securities Trading Company Limited)) was the 7th top buyer of shares of "BEXIMCO" for the said period. After examining the relevant documents, it was also observed that the said clients participated in trading of shares of "BEXIMCO" in association with total 12 (Twelve) accounts and the details of the same are delineated as follows:

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SL	Client Name	Client Code	BO ID	Name of Depository Participant	Remarks
1	MOSFEQUR RAHMAN	Dhn8733	1201930019678794	Beximco Securities Limited	Mr. Mosfequr Rahman & Mr. Momtazur Rahman are brothers.
2	MOSFEQUR RAHMAN	CTG1994	1203620069141133	Green Delta Securities Limited	
3	MOSFEQUR RAHMAN	J3461	1605400019678794	Janata Capital and Investment Limited	
4	MOSFEQUR RAHMAN	2169	1204500019678794	City Brokerage Limited	
5	MOMTAZUR RAHMAN	Dhn8732	1201930019678719	Beximco Securities Limited	
6	MOMTAZUR RAHMAN	2168	1204500019678719	City Brokerage Limited	
7	MOMTAZUR RAHMAN	J3463	1605400019678719	Janata Capital and Investment Limited	
8	JUPITAR BUSINESS LTD.	Dhn8369	1201930046413474	Beximco Securities Limited	Mr. Mosfequr Rahman & Mr. Momtazur Rahman are the directors.
9	JUPITAR BUSINESS LTD.	I2797	1601760046413474	AB Investment Limited	
10	JUPITAR BUSINESS LTD.	J3504	1605400046413474	Janata Capital and Investment Limited	
11	ART INTERNATIONAL LTD	Dhn8672	1201930068671701	Beximco Securities Limited	
12	APOLLO TRADING LIMITED	J3505	1605400069100429	Janata Capital and Investment Limited	

1. Trade Pattern, effects of the BEXIMCO at DSE and Gain and Loss by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates are given below:

a) Trade Pattern of Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates (Public Market):

Date	Code # dhn8732				Code # 2168				Code # J3463				Code # dhn8733				Code # CTG1994			
	BO ID # 1201930019678719				BO ID # 1204500019678719				BO ID # 1605400019678719				BO ID # 1201930019678794				BO ID # 1203620069141133			
	MOMTAZUR RAHMAN				MOMTAZUR RAHMAN				MOMTAZUR RAHMAN				MOSFEQUR RAHMAN				Mosfequr Rahman			
	Beximco Securities Limited				City Brokerage Limited				Janata Capital and Investment Limited				Beximco Securities Limited				Green Delta Securities Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
28-07-2021	0	0.00	597923	90.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-07-2021	0	0.00	379000	90.99	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400000	90.95	0	0.00	0	0.00
02-08-2021	0	0.00	500000	92.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	500000	92.21	0	0.00	0	0.00
03-08-2021	0	0.00	1000000	93.62	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1000000	93.70	0	0.00	0	0.00
05-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	94.00	0	0.00
09-08-2021	0	0.00	500000	97.06	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	500000	97.06	100000	96.90	0	0.00
10-08-2021	0	0.00	500000	97.78	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	500000	97.51	0	0.00	0	0.00
11-08-2021	0	0.00	600000	99.56	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400000	99.79	0	0.00	0	0.00
12-08-2021	0	0.00	1000000	107.29	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	107.50	50000	110.00
16-08-2021	0	0.00	1500000	105.82	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	945	105.50	0	0.00
17-08-2021	0	0.00	897064	104.33	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-08-2021	0	0.00	1500000	105.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-08-2021	0	0.00	1500000	106.84	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-08-2021	0	0.00	2000000	108.91	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	150945	107.42
23-08-2021	0	0.00	1000000	107.16	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	3353262	104.99	0	0.00	0	0.00	0	0.00	200000	106.63	0	0.00
25-08-2021	0	0.00	179071	103.74	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	104.25	0	0.00
26-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20028	103.80	0	0.00	0	0.00
29-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8000	103.50	0	0.00
01-09-2021	0	0.00	0	0.00	0	0.00	118012	110.92	503481	107.48	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-09-2021	0	0.00	0	0.00	0	0.00	150000	114.00	801612	111.26	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	7487571	114.66	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	158000	120.00
Total	0		13653058		0		268012		14247786		0		0		3320028		573135		358945	

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Date	Code # J3461				Code # 2169				Code # dhn8672				Code # dhn8369				Code # 12797			
	BO ID # 1605400019678794				BO ID # 1204500019678794				BO ID # 1201930068671701				BO ID # 1201930046413474				BO ID # 1601760046413474			
	MOSFEQUR RAHMAN				MOSFEQUR RAHMAN				ART INTERNATIONAL LTD				JUPITAR BUSINESS LTD.				JUPITAR BUSINESS LTD.			
	Janata Capital and Investment Limited				City Brokerage Limited				Beximco Securities Limited				Beximco Securities Limited				AB Investment Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
28-07-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-07-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1995000	93.74	2000000	93.71
09-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	800000	96.03
10-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-08-2021	0	0.00	2898	99.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	500000	106.17
17-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	500000	106.00
18-08-2021	250730	104.94	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-08-2021	0	0.00	0	0.00	0	0.00	950097	104.56	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1000000	104.08	0	0.00	300000	104.10	0	0.00	500000	104.00
29-08-2021	3163551	104.01	0	0.00	0	0.00	0	0.00	0	0.00	1000000	103.98	0	0.00	0	0.00	0	0.00	0	0.00
31-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1350000	106.90	0	0.00	0	0.00	0	0.00	0	0.00
01-09-2021	7604113	110.26	0	0.00	0	0.00	0	0.00	0	0.00	1500000	110.19	0	0.00	0	0.00	0	0.00	1000000	110.00
02-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-09-2021	0	0.00	0	0.00	0	0.00	113000	118.83	0	0.00	2000000	118.55	0	0.00	0	0.00	0	0.00	69000	119.22
06-09-2021	2601351	120.01	2610286	119.92	0	0.00	0	0.00	0	0.00	3367000	118.37	0	0.00	0	0.00	0	0.00	0	0.00
Total	13619745		2613184		0		1063097		0		11717000		0		300000		1995000		5369000	

Date	Code # J3504				Code # J3505				Total					
	BO ID # 1605400046413474				BO ID # 1605400069100429									
	JUPITAR BUSINESS LTD.				APOLLO TRADING LIMITED									
	Janata Capital and Investment Limited				Janata Capital and Investment Limited									
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
28-07-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	597923	90.24	53957551.00
29-07-2021	320000	91.11	0	0.00	340000	91.22	0	0.00	660000	91.17	60170994.00	779000	90.97	70864857.00
02-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	1000000	92.20	92203798.40
03-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	1995000	93.74	187018273.70	4000000	93.68	374729874.20
05-08-2021	20456	96.90	0	0.00	0	0.00	0	0.00	70456	94.84	6682186.40	800000	96.03	76824119.40
09-08-2021	7928736	97.09	0	0.00	3360888	97.13	0	0.00	11389624	97.10	1105899936.70	1000000	97.06	97060000.00
10-08-2021	727961	97.96	0	0.00	8305541	97.25	0	0.00	9033502	97.31	879057392.40	1000000	97.65	97646165.00
11-08-2021	3758347	99.24	0	0.00	2348915	99.83	0	0.00	6107262	99.47	607473778.60	1002898	99.66	99943917.10
12-08-2021	4620231	108.41	0	0.00	1475684	106.47	0	0.00	6145915	107.94	663382067.50	1550000	107.02	165876396.80
16-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	945	105.50	99697.50	2000000	105.87	211734168.60
17-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	897064	104.33	93592037.80
18-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	250730	104.94	26312552.80	1500000	105.00	157498364.60
19-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	1650945	106.89	176475131.50
22-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	2000000	108.91	217827601.40
23-08-2021	812762	106.81	0	0.00	0	0.00	0	0.00	1012762	106.78	108138981.60	1000000	107.16	107160692.50
24-08-2021	3415574	105.55	0	0.00	0	0.00	0	0.00	6818836	105.26	717764505.00	950097	104.56	99341218.30
25-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	999099	103.98	103886476.20
26-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	1000000	104.08	104077944.30
29-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	3171551	104.01	329877037.20	1000000	103.98	103979000.00
31-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	503481	107.48	54115645.20	1350000	106.90	144318213.30
01-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	8405725	110.35	927584986.50	2618012	110.15	288376112.00
02-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	7487571	114.66	858528686.60	1650000	114.63	189146685.50
05-09-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	2340000	118.68	277709572.20
06-09-2021	2078497	120.03	0	0.00	4084132	117.64	0	0.00	10980030	118.89	1305465612.60	5977286	119.05	711583746.00
Total	23682564		0		19915160		0		74033390			38662324		

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b) Effects of "BEXIMCO" at DSE (both block & public Market) by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates:
Opening Balance: 143,959,675

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	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 (%)
Opening Balance																		
28-07-2021	0	0.00	0.00	597923	90.24	53957551.00		71.55	42782417.33	143361752	71.55	10300561935.16						
29-07-2021	660000	91.17	60170994.00	779000	90.97	70864857.00		71.64	55808815.94	143242752	71.64	10262141695.89	6692753	91.30	1.11%	9.86%	11.64%	13.65%
02-08-2021	0	0.00	0.00	1000000	92.20	92203798.40		71.64	71641612.25	142242752	71.64	10190500083.65	6407408	92.00	0.77%	0.00%	15.61%	21.50%
03-08-2021	1995000	93.74	187018273.70	4000000	93.68	374729874.20		71.95	287789242.79	140237752	71.95	10089729114.56	11821056	94.20	2.39%	16.88%	33.84%	15.61%
05-08-2021	70456	94.84	6682186.40	800000	96.03	76824119.40		71.96	57567045.83	139508208	71.96	10038844255.13	13421701	96.90	2.87%	16.88%	33.84%	50.71%
09-08-2021	11389624	97.10	1105899936.70	1000000	97.06	97060000.00		73.86	73856224.73	149897832	73.86	11070887967.09	15763734	97.10	2.87%	0.52%	5.96%	6.49%
10-08-2021	9033502	97.31	879057392.40	1000000	97.65	97646165.00		75.19	75189360.45	157931334	75.19	11874755999.04	17452628	97.90	0.21%	72.25%	6.34%	78.60%
11-08-2021	6107262	99.47	607473778.60	1002898	99.66	99943917.10		76.09	76313767.52	163035698	76.09	12405916010.12	20039438	102.60	4.80%	51.76%	5.73%	57.49%
12-08-2021	6145915	107.94	663382067.50	1550000	107.02	165876396.80		77.25	119737669.25	167631613	77.25	12949560408.37	24420083	102.60	4.80%	30.48%	5.00%	35.48%
16-08-2021	945	105.50	99697.50	2000000	105.87	211734168.60		77.25	154500536.89	165632558	77.25	12949560408.37	24420083	107.50	4.78%	25.17%	6.35%	31.51%
17-08-2021	0	0.00	0.00	897064	104.33	93592037.80		77.25	69298434.81	164735494	77.25	12795159568.98	14488814	104.50	-2.79%	0.01%	13.80%	13.81%
18-08-2021	250730	104.94	26312552.80	1610100	104.09	167596534.60		77.29	124448419.73	163376124	77.29	12725861134.17	10464459	101.70	-2.68%	0.00%	8.57%	8.57%
19-08-2021	0	0.00	0.00	1650945	106.89	176475131.50		77.29	127605425.94	161725179	77.29	12627725267.24	12520413	105.60	3.83%	2.00%	12.86%	14.86%
22-08-2021	0	0.00	0.00	2000000	108.91	217827601.40		77.29	154584708.68	159725179	77.29	12500119841.30	14530285	107.90	2.18%	0.00%	11.36%	11.36%
23-08-2021	1012762	106.78	108138981.60	1000000	107.16	107160692.50		77.48	77478123.94	159737941	77.48	12376195990.28	12147748	106.60	1.11%	0.00%	14.14%	14.14%
24-08-2021	6818836	105.26	717764505.00	950097	104.56	99341218.30		78.62	74692443.07	165606680	78.62	13019268052.20	18011198	104.30	-2.29%	8.34%	8.23%	16.57%
25-08-2021	0	0.00	0.00	999099	103.98	103886476.20		78.62	78544764.57	164607581	78.62	12940723287.64	8397620	104.10	-2.16%	37.86%	5.28%	43.13%
26-08-2021	0	0.00	0.00	1000000	104.08	104077944.30		78.62	78615597.22	163607581	78.62	12862107690.41	5391773	104.10	-0.19%	0.00%	11.90%	11.90%
29-08-2021	3231551	104.20	336717037.20	1000000	103.98	103979000.00		79.11	79111084.85	165839132	79.11	13119713642.77	10302645	104.60	0.00%	0.00%	18.55%	18.55%
31-08-2021	503481	107.48	54115645.20	1350000	106.90	144318213.30		79.20	106915896.16	164992613	79.20	13066913391.80	11157987	104.60	0.48%	31.37%	9.71%	41.07%
01-09-2021	8405725	110.35	927584986.50	2618012	110.15	288376112.00		80.71	211292478.99	170780326	80.71	13783205899.32	13869357	107.20	2.49%	4.51%	12.10%	16.61%
02-09-2021	7617571	114.79	874414686.60	1650000	114.63	189146685.50		82.16	135568156.20	176747897	82.16	14522052429.71	13640815	111.30	3.82%	60.61%	18.88%	79.48%
05-09-2021	0	0.00	0.00	2340000	118.68	277709572.20		82.16	192260294.25	174407897	82.16	14522052429.71	13640815	115.60	3.86%	55.84%	12.10%	67.94%
06-09-2021	11155029	119.09	1328440482.60	5977286	119.05	711583746.00		84.38	504377337.81	179585640	84.38	14329792135.46	15476789	119.80	3.63%	0.00%	15.12%	15.12%
Total	74398389	105.96	7883273204.30	38772424	106.41	4125911813.10	0	78.15	3029979859.21	179585640	84.38	15153855280.25	22108710	119.80	0.00%	50.46%	27.04%	77.49%

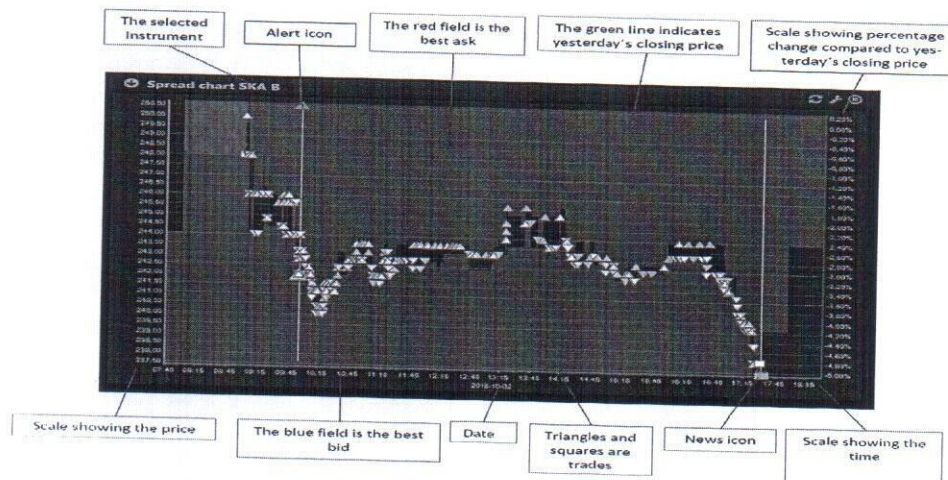
Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
364999	125.21	45700870.00	110100	91.72	10098170.00	74398389	105.96	7883273204.30	38772424	106.41	4125911813.10	78.15	3029979859.21	179585640	84.38	15153855280.25	

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c) Trade monitoring screenshots based on public market trade of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates:

IED collected Trade monitoring screenshots from Surveillance Department on some trading dates where appearance of active trading of Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates was observed which influenced the price of BEXIMCO.

The details of the graphs are given below:



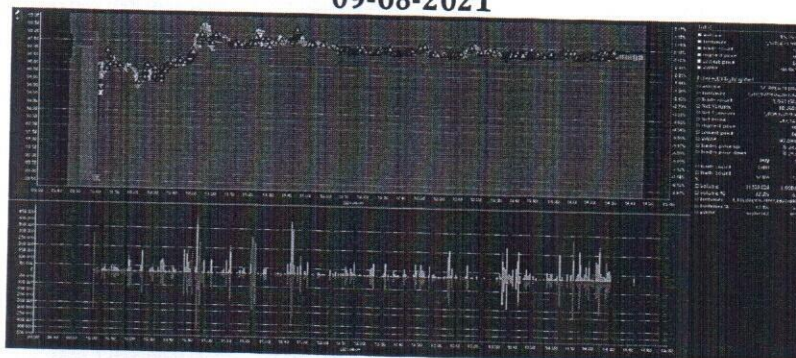
▲ Green triangle represents trade of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates

△ White triangle represents trade of BEXIMCO by other clients

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were involved in trading of shares of BEXIMCO which influenced price of the said shares on several dates:

1201930019678719, 1204500019678719, 1605400019678719, 1201930019678794, 120362006914113, 1605400019678794, 1204500019678794, 1201930068671701, 1201930046413474, 1601760046413474, 1605400046413474, 1605400069100429
(combined)

09-08-2021



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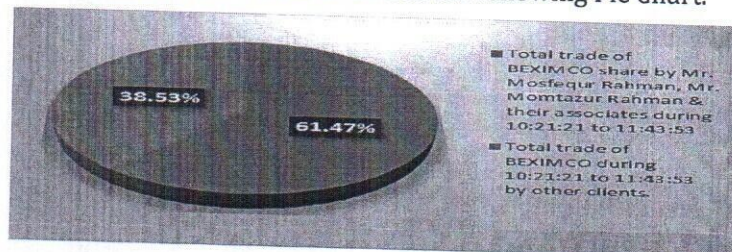
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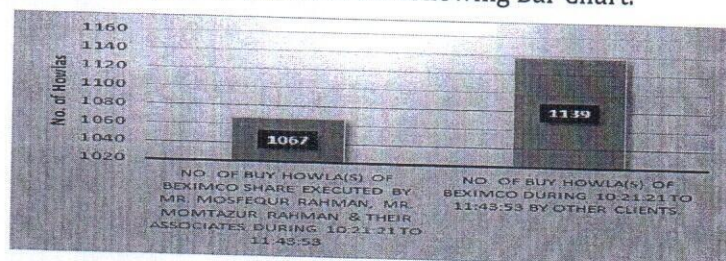
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It was observed in the above graph that on 09-08-2021, total number of trades of BEXIMCO in the market was 5212, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 3003 which is approximately 57.62% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 15,763,734 whereas buy volume by the said client(s) was 11,389,624 which is approximately 72.25% of the total traded volume in the market. It is evident that the client had significant participation in the market on 09-08-2021 in trading of BEXIMCO share.

On 09-08-2021, trading of BEXIMCO share was started at Tk. 88.60 which is Tk. 8.30 less than the YCP of Tk. 96.90. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 10:21:21 at price Tk. 94.50 and induced the same to rise to Tk. 98.40 up to 11:43:53 and continued trading throughout the whole day. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 10:21:21 to 11:43:53, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 3,694,082 shares of BEXIMCO compared to the total traded share of 6,009,494. This is shown in the following Pie Chart.

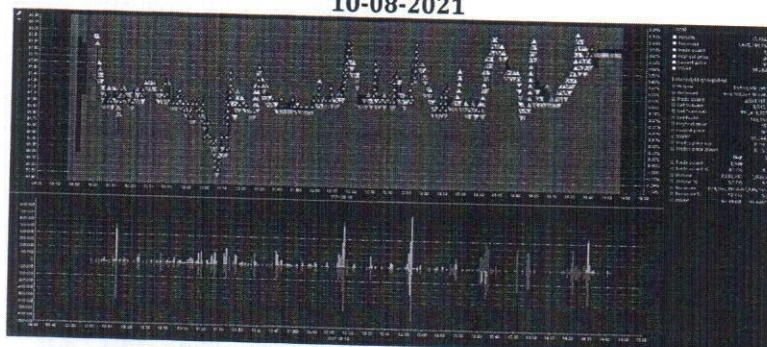


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 1,067 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 2,206 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 61.47% of the total trades of BEXIMCO shares by executing 1,067 of total 2,206 howlas from 10:21:21 to 11:43:53 on 09-08-2021. From 10:21:21 to 11:43:53, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 94.50 to Tk. 98.40. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

10-08-2021



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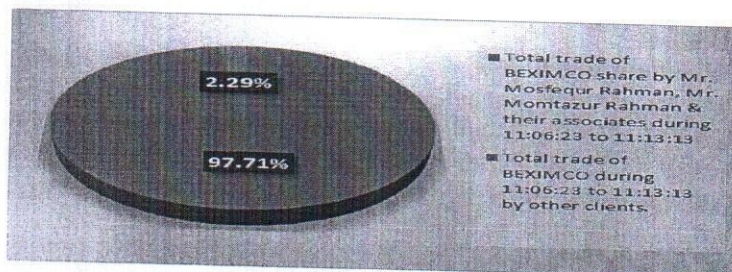
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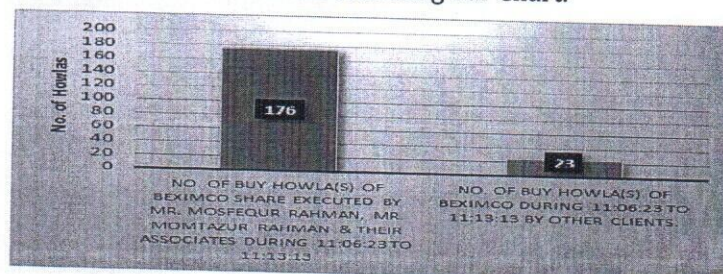
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It was observed in the above graph that on 10-08-2021, total number of trades of BEXIMCO in the market was 4890, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 1989 which is approximately 40.67% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 17,152,628 whereas buy volume by the said client(s) was 9,033,502 which is approximately 52.67% of the total traded volume in the market. It is evident that the client had significant participation in the market on 10-08-2021 in trading of BEXIMCO share.

On 10-08-2021, trading of BEXIMCO share was started at Tk. 98.00 which is Tk. 0.90 more than the YCP of Tk. 97.10. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 11:06:23 at price Tk. 95.90 and induced the same to rise to Tk. 97.50 up to 11:13:13. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 11:06:23 to 11:13:13, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 676,349 shares of BEXIMCO compared to the total traded share of 692,197. This is shown in the following Pie Chart.



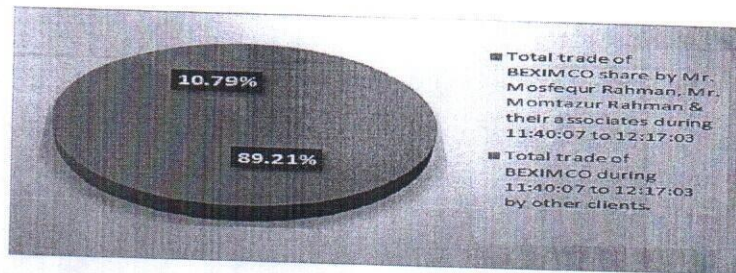
It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 176 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 199 as shown in the following Bar Chart.



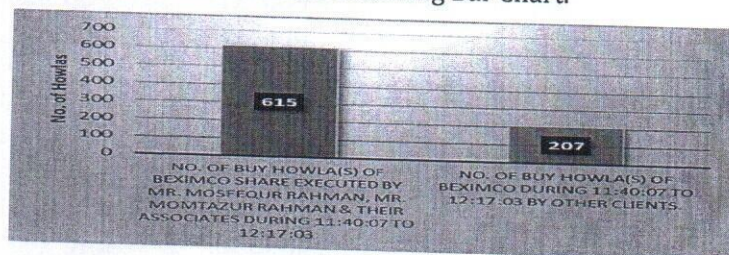
It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 97.71% of the total trades of BEXIMCO shares by executing 176 of total 199 howlas from 11:06:23 to 11:13:13 on 10-08-2021. From 11:06:23 to 11:13:13, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 95.90 to Tk. 97.50. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

On 10-08-2021, again Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 11:40:07 at price Tk. 97.00 and induced the same to rise to Tk. 98.00 up to 12:17:03. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 11:40:07 to 12:17:03, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 2,403,859 shares of BEXIMCO compared to the total traded share of 2,694,732. This is shown in the following Pie Chart.

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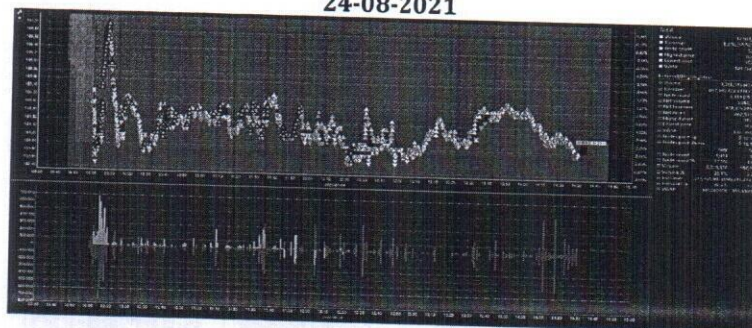


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 615 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 822 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 89.21% of the total trades of BEXIMCO shares by executing 615 of total 822 howlas from 11:40:07 to 12:17:03 on 10-08-2021. From 11:40:07 to 12:17:03, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 97.00 to Tk. 98.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

24-08-2021



It was observed in the above graph that on 24-08-2021, total number of trades of BEXIMCO in the market was 5797, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 1014 which is approximately 17.49% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 17,911,298 whereas buy volume by the said client(s) was 6,818,836 which is approximately 38.07% of the total traded volume in the market. It is evident that the client had significant participation in the market on 24-08-2021 in trading of BEXIMCO share.

On 24-08-2021, trading of BEXIMCO share was started at Tk. 105.00 which is Tk. 1.60 less than the YCP of Tk. 106.60. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 10:01:56 at price Tk. 103.90 and induced the same to rise to Tk. 107.00 up to 10:08:26. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 10:01:56 to 10:08:26, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 2,929,926 shares of BEXIMCO compared to the total traded share of 3,428,524. This is shown in the following Pie Chart.

[Handwritten signature]

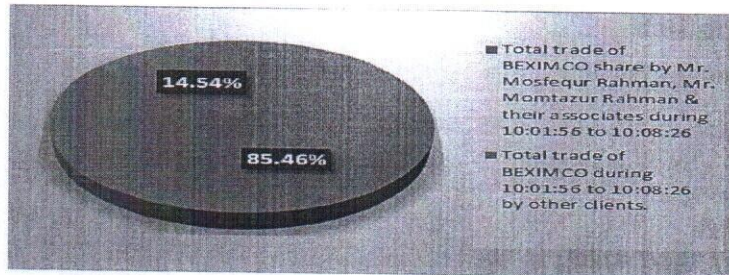
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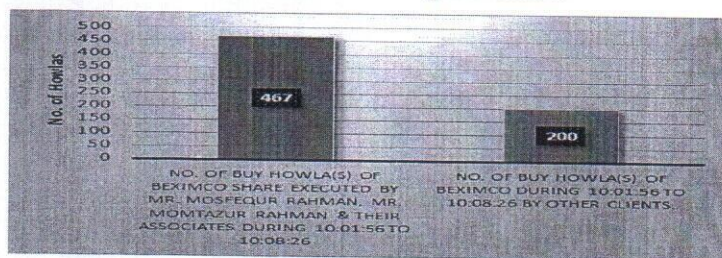
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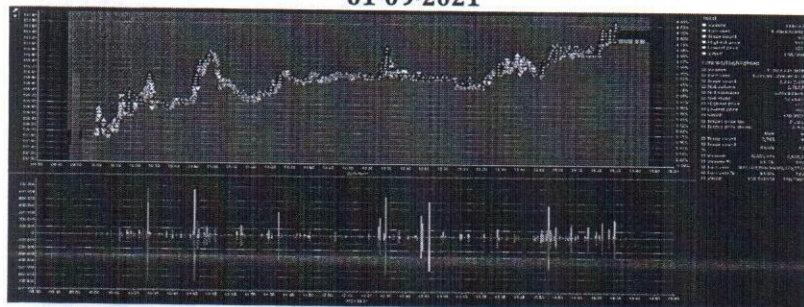


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 467 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 667 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 85.46% of the total trades of BEXIMCO shares by executing 467 of total 667 howlas from 10:01:56 to 10:08:26 on 24-08-2021. From 10:01:56 to 10:08:26, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 103.90 to Tk. 107.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

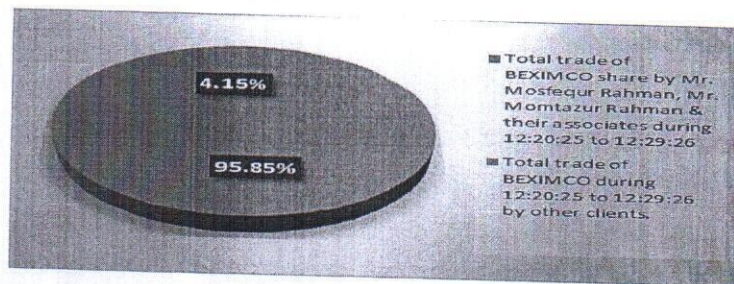
01-09-2021



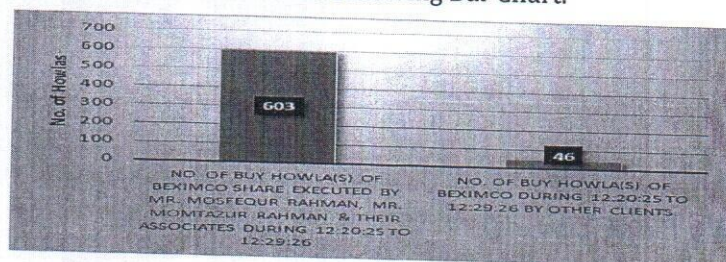
It was observed in the above graph that on 01-09-2021, total number of trades of BEXIMCO in the market was 6346, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 2765 which is approximately 43.57% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 13,619,357 whereas buy volume by the said client(s) was 8,405,725 which is approximately 61.72% of the total traded volume in the market. It is evident that the client had significant participation in the market on 01-09-2021 in trading of BEXIMCO share.

On 01-09-2021, trading of BEXIMCO share was started at Tk. 107.90 which is Tk. 0.70 more than the YCP of Tk. 107.20. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 12:20:25 at price Tk. 110.00 and induced the same to rise to Tk. 111.00 up to 12:29:26. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 12:20:25 to 12:29:26, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 1,088,505 shares of BEXIMCO compared to the total traded share of 1,135,638. This is shown in the following Pie Chart.

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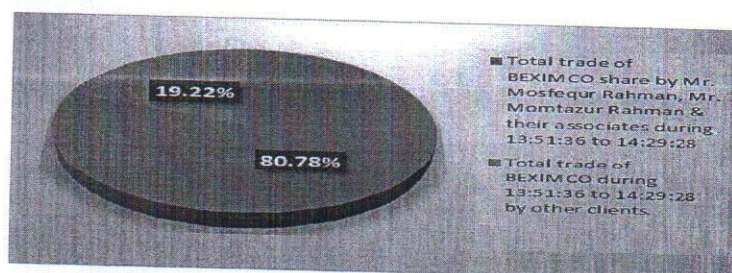


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 603 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 649 as shown in the following Bar Chart.

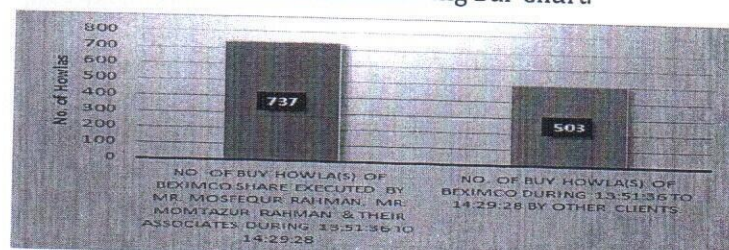


It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 95.85% of the total trades of BEXIMCO shares by executing 603 of total 649 howlas from 12:20:25 to 12:29:26 on 01-09-2021. From 12:20:25 to 12:29:26, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 110.00 to Tk. 111.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

On 01-09-2021, again Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 13:51:36 at price Tk. 110.30 and induced the same to rise to Tk. 111.90 up to 14:29:28. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 13:51:36 to 14:29:28, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 2,603,209 shares of BEXIMCO compared to the total traded share of 3,222,482. This is shown in the following Pie Chart.



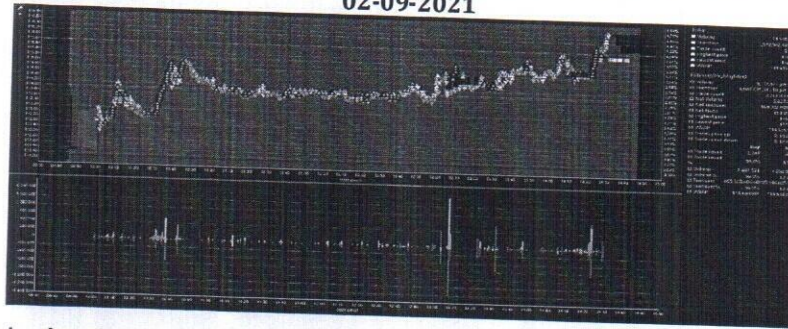
It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 737 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 1,240 as shown in the following Bar Chart.



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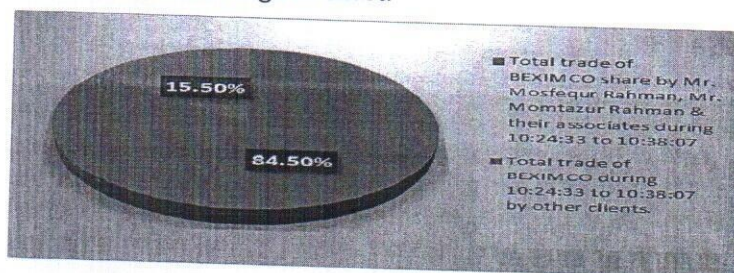
It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 80.78% of the total trades of BEXIMCO shares by executing 737 of total 1,240 howlas from 13:51:36 to 14:29:28 on 01-09-2021. From 13:51:36 to 14:29:28, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 110.30 to Tk. 111.90. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 4.10 which is approximately 3.82% higher than YCP.

02-09-2021

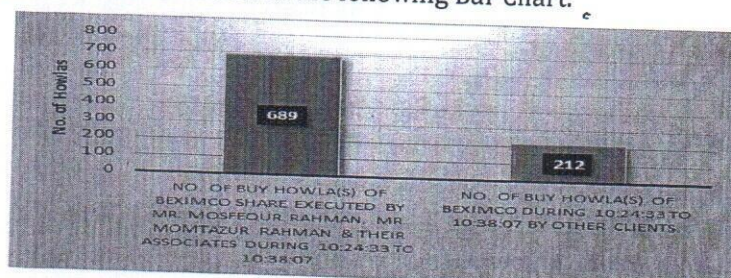


It was observed in the above graph that on 02-09-2021, total number of trades of BEXIMCO in the market was 5668, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 2247 which is approximately 39.64% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 13,370,815 whereas buy volume by the said client(s) was 7,487,571 which is approximately 56.00% of the total traded volume in the market. It is evident that the client had significant participation in the market on 02-09-2021 in trading of BEXIMCO share.

On 02-09-2021, trading of BEXIMCO share was started at Tk. 112.70 which is Tk. 1.40 more than the YCP of Tk. 111.30. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 10:24:33 at price Tk. 112.90 and induced the same to rise to Tk. 115.00 up to 10:38:07. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 10:24:33 to 10:38:07, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 1,442,300 shares of BEXIMCO compared to the total traded share of 1,706,886. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 689 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 901 as shown in the following Bar Chart.



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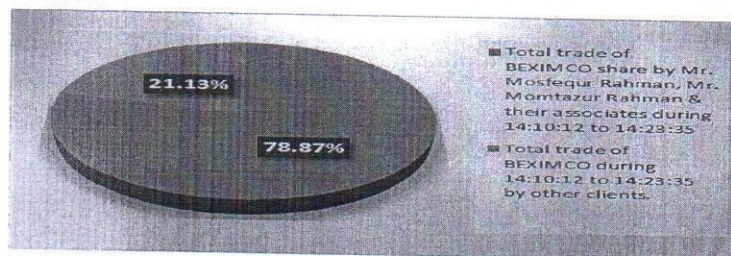
Enforcement Department

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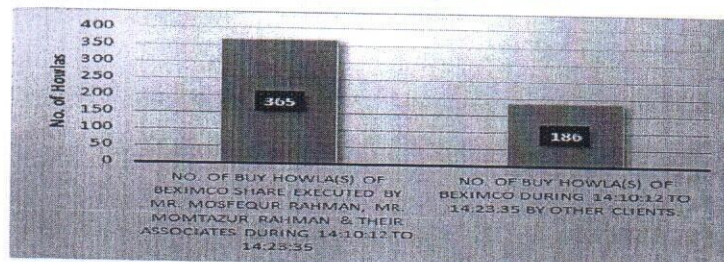
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It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 84.50% of the total trades of BEXIMCO shares by executing 689 of total 901 howlas from 10:24:33 to 10:38:07 on 02-09-2021. From 10:24:33 to 10:38:07, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 112.90 to Tk. 115.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

On 02-09-2021, again Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 14:10:12 at price Tk. 115.00 and induced the same to rise to Tk. 116.00 up to 14:23:35. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 14:10:12 to 14:23:35, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 1,423,013 shares of BEXIMCO compared to the total traded share of 1,804,337. This is shown in the following Pie Chart.

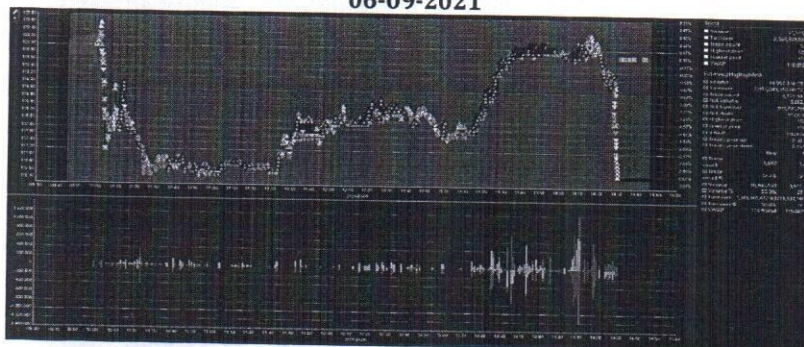


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 365 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 551 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 78.87% of the total trades of BEXIMCO shares by executing 365 of total 551 howlas from 14:10:12 to 14:23:35 on 02-09-2021. From 14:10:12 to 14:23:35, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 115.00 to Tk. 116.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 4.30 which is approximately 3.86% higher than YCP.

06-09-2021



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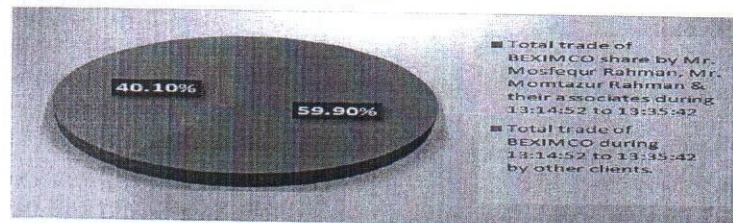
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

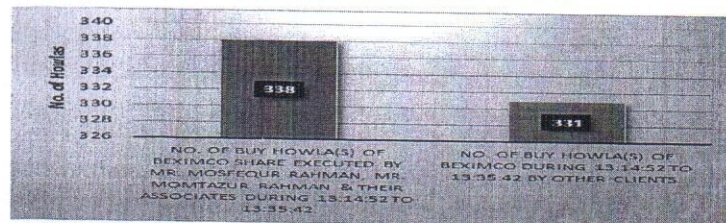
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It was observed in the above graph that on 06-09-2021, total number of trades of BEXIMCO in the market was 5803, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were 1897 which is approximately 32.69% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 21,573,711 whereas buy volume by the said client(s) was 10,980,030 which is approximately 50.90% of the total traded volume in the market. It is evident that the client had significant participation in the market on 06-09-2021 in trading of BEXIMCO share.

On 06-09-2021, trading of BEXIMCO share was started at Tk. 120.00 which is Tk. 0.20 more than the YCP of Tk. 119.80. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates started series of trading at 13:14:52 at price Tk. 117.80 and induced the same to rise to Tk. 120.00 up to 13:35:42. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed significant trades during this time period. It is mentionable here that from 13:14:52 to 13:35:42, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 1,862,207 shares of BEXIMCO compared to the total traded share of 3,108,647. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates executed 338 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 669 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 59.90% of the total trades of BEXIMCO shares by executing 338 of total 669 howlas from 13:14:52 to 13:35:42 on 06-09-2021. From 13:14:52 to 13:35:42, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates induced the price to rise from Tk. 117.80 to Tk. 120.00. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were actively trying to lift the price of BEXIMCO share.

d) Gain and Loss by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates from 28.07.2021 to 06.09.2021:

Realized Capital gain (loss) per unit	28.27	Average Sale Price - Average Cost Price
Realized Capital gain (loss)%	36.17%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain (loss)TK	109,59,31,953.89	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (06-09-2021)	119.80	Closing Price of Last Investigation Date
Unrealized gain (loss) per unit	35.42	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain (loss) %	41.97%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain (loss) TK	636,05,04,391.75	Quantity of Stock Positon x Unrealized gain (loss) per unit

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As per DSE trade data, Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates bought 74,398,389 shares and sold 38,772,424 shares of "BEXIMCO" from both block and public market during the period from 28.07.2021 to 06.09.2021 with their 12 (twelve) BO accounts. With the said 12 (twelve) accounts Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates collectively traded 35.69% of total trade volume and realized a capital gain of Tk. 1,095,931,953.89 from the trading of "BEXIMCO" share during the investigation period. It is also mentionable that this group of clients had significant amount of unrealized gain of Tk. 6,360,504,391.75.

Findings-1:

As per **Section 17(e)(v) 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 inducing its purchase by others or depressing its price for the purpose of inducing its sale by others;"*

Hence, it is observed from the aforesaid discussion that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were involved directly and indirectly in a series of transaction of share of 'BEXIMCO' in order to create the appearance of active trading of the said share.

Contraventions-1:

It appears that **Mr. Mosfequr Rahman** (BOID # 1605400019678794), **Mr. Momtazur Rahman** (BOID # 1605400019678719) & their associates have violated the following-

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



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Observation-2:

As per ledger, instrument ledger and portfolio statement of Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates, collected from the respective Depository Participants, it was observed that they had collectively acquired more than 10% shares of "BEXIMCO" as on during the investigation period. Details are given below:

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					28-07-2021		29-07-2021		02-08-2021		03-08-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	19205135	2.19%	18826135	2.15%	18326135	2.09%	17326135	1.98%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2118012	0.24%	2118012	0.24%	2118012	0.24%	2118012	0.24%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	22786564	2.60%	22786564	2.60%	22786564	2.60%	22786564	2.60%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	31320028	3.57%	30920028	3.53%	30420028	3.47%	29420028	3.36%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	0	0.00%	0	0.00%	0	0.00%	0	0.00%
6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	24016125	2.74%	24016125	2.74%	24016125	2.74%	24016125	2.74%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	2063097	0.24%	2063097	0.24%	2063097	0.24%	2063097	0.24%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	14285000	1.63%	14285000	1.63%	14285000	1.63%	14285000	1.63%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	427486	0.05%	427486	0.05%	427486	0.05%	427486	0.05%
10	JUPITAR BUSINESS LTD.	1601760046413474	12797	AB Investment Limited	4374000	0.50%	4374000	0.50%	4374000	0.50%	4369000	0.50%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	10489334	1.20%	10809334	1.23%	10809334	1.23%	10809334	1.23%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	12276971	1.40%	12616971	1.44%	12616971	1.44%	12616971	1.44%
Total					143361752	16.36%	143242752	16.35%	142242752	16.23%	140237752	16.00%

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					05-08-2021		09-08-2021		10-08-2021		11-08-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	17326135	1.98%	16826135	1.92%	16326135	1.86%	15726135	1.79%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2118012	0.24%	2118012	0.24%	2118012	0.24%	2118012	0.24%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	22786564	2.60%	22786564	2.60%	22786564	2.60%	22786564	2.60%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	29420028	3.36%	28920028	3.30%	28420028	3.24%	28020028	3.20%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	50000	0.01%	50000	0.02%	50000	0.02%	50000	0.02%
6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	24016125	2.74%	24016125	2.74%	24016125	2.74%	24013227	2.74%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	2063097	0.24%	2063097	0.24%	2063097	0.24%	2063097	0.24%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	14285000	1.63%	14285000	1.63%	14285000	1.63%	14285000	1.63%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	427486	0.05%	427486	0.05%	427486	0.05%	427486	0.05%
10	JUPITAR BUSINESS LTD.	1601760046413474	12797	AB Investment Limited	3569000	0.41%	3569000	0.41%	3569000	0.41%	3569000	0.41%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	10829790	1.24%	18758526	2.14%	19486487	2.22%	23244834	2.65%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	12616971	1.44%	15977859	1.82%	24283400	2.77%	26632315	3.04%
Total					139508208	15.92%	149897832	17.11%	157931334	18.02%	163035698	18.60%

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					12-08-2021		16-08-2021		17-08-2021		18-08-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	14726135	1.68%	13226135	1.51%	12329071	1.41%	10829071	1.24%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2118012	0.24%	2118012	0.24%	2118012	0.24%	2118012	0.24%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	22786564	2.60%	22786564	2.60%	22786564	2.60%	22786564	2.60%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	28020028	3.20%	28020028	3.20%	28020028	3.20%	28020028	3.20%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	150000	0.02%	150945	0.02%	150945	0.02%	150945	0.02%
6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	24013227	2.74%	24013227	2.74%	24013227	2.74%	24153857	2.76%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	2063097	0.24%	2063097	0.24%	2063097	0.24%	2063097	0.24%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	14285000	1.63%	14285000	1.63%	14285000	1.63%	14285000	1.63%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	427486	0.05%	427486	0.05%	427486	0.05%	427486	0.05%
10	JUPITAR BUSINESS LTD.	1601760046413474	12797	AB Investment Limited	3069000	0.35%	2569000	0.29%	2569000	0.29%	2569000	0.29%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	27865065	3.18%	27865065	3.18%	27865065	3.18%	27865065	3.18%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	28107999	3.21%	28107999	3.21%	28107999	3.21%	28107999	3.21%
Total					167631613	19.13%	165632558	18.90%	164735494	18.80%	163376124	18.64%

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					19-08-2021		22-08-2021		23-08-2021		24-08-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	9329071	1.06%	7329071	0.84%	6329071	0.72%	6329071	0.72%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2118012	0.24%	2118012	0.24%	2118012	0.24%	2118012	0.24%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	22786564	2.60%	22786564	2.60%	22786564	2.60%	26139826	2.98%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	28020028	3.20%	28020028	3.20%	28020028	3.20%	28020028	3.20%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	0	0.00%	0	0.00%	200000	0.02%	250000	0.03%
6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	24153857	2.76%	24153857	2.76%	24153857	2.76%	24153857	2.76%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	2063097	0.24%	2063097	0.24%	2063097	0.24%	1113000	0.13%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	14285000	1.63%	14285000	1.63%	14285000	1.63%	14285000	1.63%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	427486	0.05%	427486	0.05%	427486	0.05%	427486	0.05%
10	JUPITAR BUSINESS LTD.	1601760046413474	12797	AB Investment Limited	2569000	0.29%	2569000	0.29%	2569000	0.29%	2569000	0.29%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	27865065	3.18%	27865065	3.18%	28677827	3.27%	32093401	3.66%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	28107999	3.21%	28107999	3.21%	28107999	3.21%	28107999	3.21%
Total					161725179	18.46%	159725179	18.23%	161725179	18.23%	165606680	18.90%

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					25-08-2021		26-08-2021		29-08-2021		31-08-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	6150000	0.70%	6150000	0.70%	6150000	0.7%	6150000	0.70%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2118012	0.24%	2118012	0.24%	2118012	0.2%	2118012	0.24%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	26139826	2.98%	26139826	2.98%	26139826	3.0%	26643307	3.04%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	28000000	3.20%	28000000	3.20%	28000000	3.2%	28000000	3.20%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	250000	0.03%	250000	0.03%	258000	0.0%	258000	0.03%

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6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	24153857	2.76%	24153857	2.76%	27377408	3.1%	27377408	3.12%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	1113000	0.13%	1113000	0.13%	1113000	0.1%	1113000	0.13%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	14285000	1.63%	13285000	1.52%	12285000	1.4%	10935000	1.25%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	127486	0.01%	127486	0.01%	127486	0.0%	127486	0.01%
10	JUPITAR BUSINESS LTD.	1601760046413474	I2797	AB Investment Limited	2069000	0.24%	2069000	0.24%	2069000	0.2%	2069000	0.24%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	32093401	3.66%	32093401	3.66%	32093401	3.7%	32093401	3.66%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	28107999	3.21%	28107999	3.21%	28107999	3.2%	28107999	3.21%
Total					164607581	18.78%	163607581	18.67%	165839132	18.92%	164992613	18.83%

Shareholding of BEXIMCO by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates as per portfolio statements					01-09-2021		02-09-2021		05-09-2021		06-09-2021	
Sl. No	Client Name	BO ID	Client Code	Name of TREC Holder	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	MOMTAZUR RAHMAN	1201930019678719	dhn8732	Beximco Securities Limited	6150000	0.70%	6150000	0.70%	6150000	0.70%	6150000	0.70%
2	MOMTAZUR RAHMAN	1204500019678719	2168	City Brokerage Limited	2000000	0.23%	1850000	0.21%	1850000	0.21%	1850000	0.21%
3	MOMTAZUR RAHMAN	1605400019678719	J3463	Janata Capital and Investment Limited	27444919	3.13%	35062490	4.00%	35062490	4.00%	37164350	4.24%
4	MOSFEQUR RAHMAN	1201930019678794	dhn8733	Beximco Securities Limited	28000000	3.20%	28000000	3.20%	28000000	3.20%	28000000	3.20%
5	MOSFEQUR RAHMAN	1203620069141133	CTG1994	Green Delta Securities Limited	258000	0.03%	258000	0.03%	100000	0.01%	214190	0.02%
6	MOSFEQUR RAHMAN	1605400019678794	J3461	Janata Capital and Investment Limited	34981521	3.99%	34981521	3.99%	34981521	3.99%	34972586	3.99%
7	MOSFEQUR RAHMAN	1204500019678794	2169	City Brokerage Limited	1113000	0.13%	1113000	0.13%	1000000	0.11%	1000000	0.11%
8	ART INTERNATIONAL LTD	1201930068671701	dhn8672	Beximco Securities Limited	9435000	1.08%	7935000	0.91%	5935000	0.68%	2568000	0.29%
9	JUPITAR BUSINESS LTD.	1201930046413474	dhn8369	Beximco Securities Limited	127486	0.01%	127486	0.01%	127486	0.01%	127486	0.01%
10	JUPITAR BUSINESS LTD.	1601760046413474	I2797	AB Investment Limited	1069000	0.12%	1069000	0.12%	1000000	0.11%	1000000	0.11%
11	JUPITAR BUSINESS LTD.	1605400046413474	J3504	Janata Capital and Investment Limited	32093401	3.66%	32093401	3.66%	32093401	3.66%	34171898	3.90%
12	APOLLO TRADING LIMITED	1605400069100429	J3505	Janata Capital and Investment Limited	28107999	3.21%	28107999	3.21%	28107999	3.21%	32367130	3.69%
Total					170780326	19.49%	176747897	20.17%	174407897	19.90%	179585640	20.49%
Total No. of Outstanding Securities					87,63,18,879							

From the above table, it is observed that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates jointly hold 7,735,324 shares on 10-03-2022 which was 13.55% of the total paid up shares of BEXIMCO which violates বিধি ০৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ since there was no declaration to buy more than 10% shares of the above instruments.

Findings-2:

As per উপ-বিধি (১) (ক) of বিধি ২ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮,

"..... (১) বিষয় বা প্রসঙ্গের পরিপন্থী কোন কিছু না থাকিলে, এই বিধিমালায়, (ক) "অধিগ্রহণকারী" অর্থ এমন কোন ব্যক্তি যে নিজে বা অন্য কাহারো সহিত সম্মিলিত হইয়া (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে রূপান্তরযোগ্য সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন্য প্রস্তাব করে....."

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

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

It is found that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates jointly hold more than 10% shares of 'BEXIMCO'. Through the aforesaid activities, it appears that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

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Contravention(s)-2:

It appears that **Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates** have violated the following:

- বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of "BEXIMCO" without declaration.

Observation # 3

It is observed from DSE Trade data that Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates were involved in trading of "BEXIMCO" shares through their BO accounts with each other on several dates. Details of counter party trade between Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates are given below:

Table: Counterparty trading of Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates (As per DSE Trade Data)

TRADE DATE	INSTRUMENT CODE	BUYER	BUYER CLIENT	BOID BUYER	SELLER	SELLER CLIENT	BOID SELLER	Matched Quantity	MARKET TYPE
23-08-21 06-09-21	BEXIMCO	MOSFEQUR RAHMAN	CTG1994	1203620069141133	MOMTAZUR RAHMAN ART INTERNATIONAL LTD.	DHN8732 DHN8672	1201930019678719 1201930068671701	100000 8021	Public
03-08-21	BEXIMCO	JUPITAR BUSINESS LTD.	I2797	1601760046413474	MOMTAZUR RAHMAN MOSFEQUR RAHMAN	DHN8732 DHN8733	1201930019678719 1201930019678794	788584 898106	Public
01-09-21 29-08-21 01-09-21 01-09-21	BEXIMCO	MOSFEQUR RAHMAN	J3461	1605400019678794	MOMTAZUR RAHMAN ART INTERNATIONAL LTD. JUPITAR BUSINESS LTD.	2168 DHN8672 I2797	1204500019678719 1201930068671701 1601760046413474	94400 1639530 995190	Public
24-08-21 31-08-21 02-09-21 06-09-21 06-09-21	BEXIMCO	MOMTAZUR RAHMAN	J3463	1605400019678719	MOSFEQUR RAHMAN ART INTERNATIONAL LTD. MOSFEQUR RAHMAN	2169 DHN8672 J3461	1204500019678794 1201930068671701 1605400019678794	406123 1129432 215752	Public
12-08-21 06-09-21 29-07-21 09-08-21 11-08-21 12-08-21 29-07-21 09-08-21 12-08-21 06-09-21	BEXIMCO	JUPITAR BUSINESS LTD.	J3504	1605400046413474	MOSFEQUR RAHMAN ART INTERNATIONAL LTD. MOMTAZUR RAHMAN MOSFEQUR RAHMAN JUPITAR BUSINESS LTD. MOSFEQUR RAHMAN	CTG1994 DHN8672 DHN8732 DHN8733 I2797 J3461	1203620069141133 1201930068671701 1201930019678719 1201930019678794 1601760046413474 1605400019678794	50000 159320 921836 421063 18670 972470	Public
06-09-21 29-07-21 09-08-21 10-08-21 11-08-21 12-08-21 29-07-21 09-08-21 10-08-21 11-08-21 12-08-21	BEXIMCO	APOLLO TRADING LIMITED	J3505	1605400069100429	ART INTERNATIONAL LTD. MOMTAZUR RAHMAN MOSFEQUR RAHMAN JUPITAR BUSINESS LTD.	DHN8672 DHN8732 DHN8733 I2797	1201930068671701 1201930019678719 1201930019678794 1601760046413474	1364904 730237 572602 396048	Public
Total Matched Quantity of Shares of BEXIMCO								11882288	

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It is also observed that total 11,882,288 shares of "BEXIMCO" were executed in 1,207 howla(s) in 13 trading days where Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their associates acted as both buyer and seller.

Since Mr. Mosfequr Rahman and Mr. Momtazur Rahman are brothers and their companies JUPITAR BUSINESS LTD., ART INTERNATIONAL LTD. and APOLLO TRADING LIMITED are involved in trading of shares of "BEXIMCO" among themselves, it created a false and misleading appearance of active trading of this security.

Findings-3:

As per section 17(e) (ii) of the Securities and exchange ordinance, 1969 (XVII of 1969), "No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

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

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

It is observed that the said clients were involved directly and indirectly in transaction of shares of BEXIMCO in order to create a false and misleading appearance of active trading of the said share.

It appears that Mr. Mosfequr Rahman, Mr. Momtazur Rahman, JUPITAR BUSINESS LTD., ART INTERNATIONAL LTD. and APOLLO TRADING LIMITED have violated section 17(e)(ii) of the Securities and exchange ordinance, 1969 for directly and indirectly involvement in transaction of shares of BEXIMCO in order to create a false and misleading appearance of active trading of the said share.

Contravention(s)-3:

It appears that **Mr. Mosfequr Rahman** (BOID # 1605400019678794), **Mr. Momtazur Rahman** (BOID # 1605400019678719) & their associates have violated the following:

- **Section 17(e)(ii) of the Securities and Exchange Ordinance, 1969** by creating a false and misleading appearance of active trade of shares of "BEXIMCO".



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****The individual Trade Pattern, combined effect of the trades in the market and individual Gain/Loss of Apollo Trading Limited respectively.

a) **Individual Trade Pattern of Apollo Trading Limited: (Public Market)**

Date	Code # J3505				Total					
	BO ID # 1605400069100429									
	APOLLO TRADING LIMITED									
	Janata Capital and Investment Limited									
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
29-07-2021	340000	91.22	0	0.00	340000	91.22	31014994.00	0	0.00	0.00
09-08-2021	3360888	97.13	0	0.00	3360888	97.13	326429077.50	0	0.00	0.00
10-08-2021	8305541	97.25	0	0.00	8305541	97.25	807749610.50	0	0.00	0.00
11-08-2021	2348915	99.83	0	0.00	2348915	99.83	234493098.20	0	0.00	0.00
12-08-2021	1475684	106.47	0	0.00	1475684	106.47	157115878.60	0	0.00	0.00
06-09-2021	4084132	117.64	0	0.00	4084132	117.64	480466834.50	0	0.00	0.00
Total	19915160		0		19915160			0		

b) **Effects of "BEXIMCO" at DSE (both block & public market) by Apollo Trading Limited:**

Opening Balance: 12,276,971

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										12276971	96.38	1183209777.37						
29-07-21	340000	91.22	31014994.00	0	0.00	0.00		0.00	0.00	12616971	96.24	1214224771.37	6692753	91.30	1.11%	5.08%	0.00%	5.08%
09-08-21	3360888	97.13	326429077.50	0	0.00	0.00		0.00	0.00	15977859	96.42	1540653848.87	15763734	97.10	0.21%	21.32%	0.00%	21.32%
10-08-21	8305541	97.25	807749610.50	0	0.00	0.00		0.00	0.00	24283400	96.71	2348403459.37	17452628	97.90	0.82%	47.59%	0.00%	47.59%
11-08-21	2348915	99.83	234493098.20	0	0.00	0.00		0.00	0.00	26632315	96.98	2582896557.57	20039438	102.60	4.80%	11.72%	0.00%	11.72%
12-08-21	1475684	106.47	157115878.60	0	0.00	0.00		0.00	0.00	28107999	97.48	2740012436.17	24420083	107.50	4.78%	6.04%	0.00%	6.04%
06-09-21	4259131	118.20	503441704.50	0	0.00	0.00		0.00	0.00	32367130	100.21	3243454140.67	22108710	119.80	0.00%	19.26%	0.00%	19.26%
Total	20090159	102.55	2060244363.30	0	0.00	0.00	0	0.00	0.00	32367130	100.21	3243454140.67						

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
174999	131.29	22974870.00	0	0.00	0.00	20090159	102.55	2060244363.30	0	0.00	0.00	0.00	0.00	32367130	100.21	3243454140.67

Individual Gain or Loss by Apollo Trading Limited from BEXIMCO during 28.07.2021 to 06.09.2021:

Financial Parameter	Apollo Trading Limited	Details
Realized Capital gain(loss)per unit	0.00	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	0.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	0.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (06-09-2021)	119.80	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	19.59	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	19.55%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	63,41,28,033.33	Quantity of Stock Positon x Unrealized gain (loss) per unit

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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক ডিসেম্বর ১২, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/১৬৪১ স্মারকমূলে APOLLO TRADING LIMITED-কে ডিসেম্বর ২২, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত তারিখ মার্চ ১৯, ২০২৩-এ APOLLO TRADING LIMITED এর পক্ষে Mr. Shafiul Islam Khan শুনানীতে উপস্থিত হয়ে মার্চ ১৬, ২০২৩ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"with due respect we would like to state that Apollo Trading Limited involved in stock market since January 01, 2019 and maintaining following BO Accounts with different Brokerage houses:

Sl. No.	Client Name	BO ID	Name of the TREC Holder	Relation
01	Apollo Trading Limited	1605400069100429	Janata Capital & Inv.	
02	Apollo Trading Limited	1201930069100429	Beximco Securities Ltd.	

I am a general investor and also not aware of securities rules & regulations. As my profession, I am working in Apollo Trading Ltd. as a Managing Director.

I personally analyzed the stock of Beximco and thought it is a potential stock for me as investment. I advised concerned institutions to buy this stock by maintaining all the BSEC laws. Due to lack of my knowledge on securities rules & regulations; Substantial Acquisition Rules was violated in my buy orders unintentionally.

Please note that, since I have started investing in secondary market I have realized & unrealized Profit/(loss) of BDT 820,796,495.00 and BDT (202,809,964.00) In the following client codes respectively:

Sl. No.	Client Name	BO ID	Realized profit & Loss (BDT)
01	Apollo Trading Limited	1605400069100429	728,376,562.00
02	Apollo Trading Limited	1201930069100429	(6,511,705.77)

Therefore, I would like to request you kindly treat the above mentioned violation of trading rules & regulations as unintentional mistake as lack of knowledge. I assure you that, in future I will be more careful and abide by all rules & regulations.

I am looking forward for your kind consideration and cooperation in this regards."

যেহেতু, APOLLO TRADING LIMITED-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তার বিরুদ্ধে উপস্থাপিত অভিযোগসমূহ সঠিক এবং উপর্যুক্ত কর্মকাণ্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে APOLLO TRADING LIMITED-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, APOLLO TRADING LIMITED উপর্যুক্ত কর্মকাণ্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii), Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছেন;

যেহেতু, APOLLO TRADING LIMITED-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

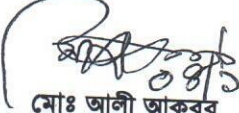
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যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য APOLLO TRADING LIMITED-কে অর্থদণ্ডে দণ্ডিত করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত ক্ষমতাবলে-

- APOLLO TRADING LIMITED-কে মোট ১.০০ (এক) লক্ষ টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। APOLLO TRADING LIMITED

(BO ID: 1605400069100429)

131, New Eskaton Road

Ramna, Dhaka.