

**Bangladesh Securities and Exchange Commission**

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬৩৭

তারিখঃ এপ্রিল ২২, ২০২৫

**Hasan nursery**

(BOID: 1201570074232417)

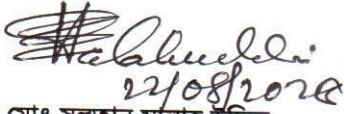
Dorirampur, Trishal

Maymenshing.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬৩৬ তারিখঃ এপ্রিল ২২, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,



মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

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

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি।
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬৩৬

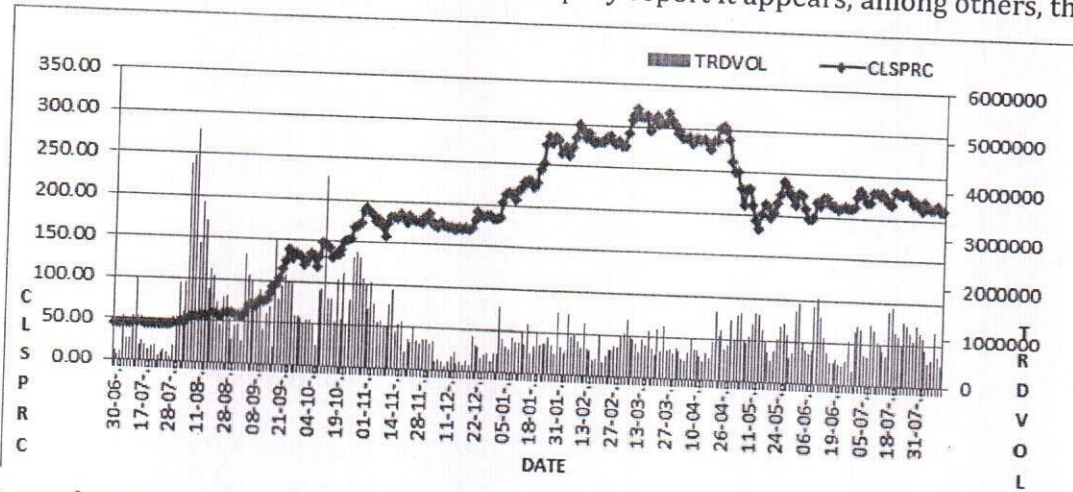
তারিখঃ এপ্রিল ২২, ২০২৫

**আদেশ**

সেহেতু, 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;  
সেহেতু, আগস্ট ২৩, ২০২৩ ও আগস্ট ২৪, ২০২৩ তারিখের কমিশনের অনুসন্ধান (Enquiry) আদেশ নং BSEC/IE & ID/Enquiry/2023/08/111 এবং BSEC/IE & ID/Enquiry/2023/08/114 দ্বারা প্রদত্ত ক্ষমতাবলে কমিশন Sea Pearl Beach Resort and Spa Limited (SEAPEARL) এর শেয়ার লেনদেনে সম্ভাব্য মূল্যকরসাজি সম্পর্কে অনুসন্ধান কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

**Description of alleged violation of securities laws:**

Whereas, pursuant to Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/111 dated August 23, 2023 and Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/114 dated August 24, 2023 the Commission formed an enquiry committee to enquire regarding the possible price manipulation activities of the share of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) by the parties including individuals, stock brokers, stock dealer, and institutions; identification of the Insider Trading of the said company and all other relevant issues. The enquiry committee enquired share trading of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) for the period from 01.07.2022 to 10.08.2023 and prepared a report. From the enquiry report it appears, among others, that:



The Yesterday Closing Price (YCP) change in the price of SEAPEARL shares from 01/07/2022 to 10/08/2023 has been substantial. The details are as follows:

- The opening price of SEAPEARL shares on 01/07/2022 was Tk. 43.70.
- The closing price of SEAPEARL shares on 10/08/2023 was Tk. 211.00.

During this period:

- The price of SEAPEARL shares increased by Tk. 167.30.



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- This represents an impressive YCP increase of approximately 382.84% compared to the closing price on 30.06.2022.

This significant percentage increase indicates substantial market movement and investor interest in SEAPEARL shares during the specified period.

## Mr. Loutful Goni Titu and His Associates:

It is apparent that the identified group of clients seems to be under the influence or leadership of a common beneficiary, namely M Loutful Goni Titu, Managing Director of Shatrong Agro Fisheries Limited.

While pursuing the mode of identification, the enquiry team notices some similar features among this group of clients on the basis of which the aforesaid clients are associated in the following manners:

| SL | BOLD             | Client Code | Client's Name                | Name of Depository Participant     | Remarks                                                                                                                                         |
|----|------------------|-------------|------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | 1201950064845550 | 43305       | Shatrong Agro Fisheries Ltd. | EBL Securities Limited             | Managing Director of Shatrong Agro Fisheries Limited; <b>M Loutful Goni Titu</b> is the <b>brother</b> of KAMRUL HASAN Md. IQBAL Goni.          |
| 2  | 1205660064845550 | 1754        | Shatrong Agro Fisheries Ltd. | Trust Bank Securities Limited      |                                                                                                                                                 |
| 3  | 1602170064845550 | 5636        | Shatrong Agro Fisheries Ltd. | Mercantile Bank Securities Limited |                                                                                                                                                 |
| 4  | 1201570073660878 | 19456       | KAMRUL HASAN Md. IQBAL Goni  | SCL Securities Ltd.                |                                                                                                                                                 |
| 5  | 1201570073611471 | 19436       | Md. Abu Nayeem               | SCL Securities Ltd.                | Md. Abu Nayeem signs as <b>witness</b> in the Margin Agreement signed between the Broker house and Shatrong Agro Fisheries Limited.             |
| 6  | 1201570074234392 | 19578       | Ridoy Poultry Firm           | SCL Securities Ltd.                | 1. All these Enterprises bearing <b>trade licenses</b> in the <b>serial order</b> from the <b>same UNION PARISHAD</b> .                         |
| 7  | 1201570074232417 | 19583       | Hasan Nursery                | SCL Securities Ltd.                |                                                                                                                                                 |
| 8  | 1201570074232152 | 19582       | Amanat Agro Fisheries        | SCL Securities Ltd.                |                                                                                                                                                 |
| 9  | 1201570074232516 | 19584       | Sabbir Store                 | SCL Securities Ltd.                | 2. As per MOA of Shatrong Agro Fisheries Limited and Trade Licenses of all these enterprises has the same address- <b>Chakrampur, Trishal</b> . |
| 10 | 1201570074231696 | 19581       | Sarker Agro Farm             | SCL Securities Ltd.                |                                                                                                                                                 |
| 11 | 1201570074232706 | 19586       | Mukta Fisheries              | SCL Securities Ltd.                |                                                                                                                                                 |



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**Observations:**

**a. Individual Trade Pattern of "Loutful Goni Titu and his Associates":**

| Date       | Code # 43305                    |        |           |        | Code # 1754                     |        |           |      | Code # 5636                        |        |           |      | Code # 19456                |      |           |      | Code # 19436             |        |           |      | Code # 19578             |        |           |        |
|------------|---------------------------------|--------|-----------|--------|---------------------------------|--------|-----------|------|------------------------------------|--------|-----------|------|-----------------------------|------|-----------|------|--------------------------|--------|-----------|------|--------------------------|--------|-----------|--------|
|            | BO ID # 1201950064845550        |        |           |        | BO ID # 1205660064845550        |        |           |      | BO ID # 1602170064845550           |        |           |      | BO ID # 1201570073660878    |      |           |      | BO ID # 1201570073611471 |        |           |      | BO ID # 1201570074234392 |        |           |        |
|            | Shatrong Agro Fisheries Limited |        |           |        | Shatrong Agro Fisheries Limited |        |           |      | Shatrong Agro Fisheries Limited    |        |           |      | KAMRUL HASAN Md. IQBAL Goni |      |           |      | md. Abu Nayeem           |        |           |      | Ridoy Poultry Firm       |        |           |        |
|            | EBL Securities Limited          |        |           |        | Trust Bank Securities Limited   |        |           |      | Mercantile Bank Securities Limited |        |           |      | SCL Securities Ltd.         |      |           |      | SCL Securities Ltd.      |        |           |      | SCL Securities Ltd.      |        |           |        |
|            | 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 | Buy Qty                  | Rate   | Sale Qty. | Rate   |
| 07-08-2022 | 500000                          | 52.99  | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 08-08-2022 | 500399                          | 54.54  | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 10-08-2022 | 0                               | 0.00   | 2865      | 55.60  | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 11-08-2022 | 0                               | 0.00   | 637534    | 54.73  | 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   |
| 14-08-2022 | 835000                          | 55.78  | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 01-09-2022 | 0                               | 0.00   | 139793    | 58.82  | 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   |
| 11-09-2022 | 0                               | 0.00   | 135652    | 72.16  | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 22-09-2022 | 0                               | 0.00   | 23000     | 123.00 | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 13-10-2022 | 371343                          | 147.08 | 259881    | 146.10 | 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   |
| 16-10-2022 | 82477                           | 145.60 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 17-10-2022 | 0                               | 0.00   | 50000     | 132.00 | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 18-10-2022 | 0                               | 0.00   | 10000     | 134.20 | 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   |
| 19-10-2022 | 0                               | 0.00   | 3000      | 135.10 | 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   |
| 20-10-2022 | 100400                          | 139.33 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 24-10-2022 | 0                               | 0.00   | 30000     | 153.75 | 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   |
| 25-10-2022 | 50750                           | 154.59 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 26-10-2022 | 51104                           | 162.15 | 30000     | 168.07 | 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   |
| 27-10-2022 | 36756                           | 170.80 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 30-10-2022 | 550233                          | 170.83 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 31-10-2022 | 101046                          | 187.65 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 01-11-2022 | 0                               | 0.00   | 45000     | 188.54 | 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   |
| 03-11-2022 | 0                               | 0.00   | 452257    | 186.59 | 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   |
| 06-11-2022 | 170912                          | 175.48 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 07-11-2022 | 20000                           | 176.85 | 25408     | 177.01 | 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   |
| 08-11-2022 | 7081                            | 173.52 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 09-11-2022 | 36795                           | 167.56 | 18409     | 169.31 | 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   |
| 10-11-2022 | 13651                           | 163.70 | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 13-11-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 40000                              | 182.70 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 15-11-2022 | 0                               | 0.00   | 158000    | 177.85 | 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   |
| 21-11-2022 | 22811                           | 176.36 | 23000     | 175.97 | 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   |
| 23-11-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 24-11-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 27-11-2022 | 0                               | 0.00   | 0         | 0.00   | 67360                           | 180.69 | 0         | 0.00 | 91300                              | 181.80 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 4000                     | 177.88 | 0         | 0.00   |
| 28-11-2022 | 0                               | 0.00   | 0         | 0.00   | 44200                           | 175.95 | 0         | 0.00 | 12000                              | 179.32 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 5280                     | 175.65 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 29-11-2022 | 49910                           | 181.80 | 0         | 0.00   | 50000                           | 183.80 | 0         | 0.00 | 13600                              | 183.60 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 30-11-2022 | 3960                            | 187.01 | 5000      | 183.39 | 60000                           | 186.40 | 0         | 0.00 | 42500                              | 186.00 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 01-12-2022 | 0                               | 0.00   | 0         | 0.00   | 5000                            | 178.70 | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 4000      | 185.58 |
| 04-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 05-12-2022 | 0                               | 0.00   | 870       | 175.60 | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 5200                     | 172.88 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 06-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 14-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 15-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 18-12-2022 | 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 | 10000                    | 171.70 | 0         | 0.00   |
| 19-12-2022 | 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 | 350                      | 172.30 | 0         | 0.00   |
| 20-12-2022 | 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 | 1000                     | 171.90 | 0         | 0.00   |
| 21-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 22-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 26-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 100                      | 191.30 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 27-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 28-12-2022 | 0                               | 0.00   | 0         | 0.00   | 0                               | 0.00   | 0         | 0.00 | 0                                  | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   |
| 29-12-2022 | 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 | 42225                    | 187.42 | 0         | 0.00   |
|            |                                 |        |           |        |                                 |        |           |      |                                    |        |           |      |                             |      |           |      |                          |        |           |      | 16699                    | 186.58 | 0         | 0.00   |



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**b. Effects of "SEAPEARL" at DSE by "Loutful Goni Titu and his associates": (Both Public & Block Market)**  
**Opening Balance: 27,045,528**

| 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 |         |        |              |         |        |              |                      |                     |              |                |                |              |                            |                        |                         |                |                 |                  |
| 07-08-2022      | 500000  | 52.99  | 26497450.00  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 500000         | 52.99          | 26497450.00  | 4758135                    | 53.00                  | 9.96%                   | 10.51%         | 0.00%           | 10.51%           |
| 08-08-2022      | 500399  | 54.54  | 27293213.50  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 1000399        | 53.77          | 53790663.50  | 4498583                    | 56.40                  | 6.42%                   | 11.12%         | 0.00%           | 11.12%           |
| 10-08-2022      | 0       | 0.00   | 0.00         | 2865    | 55.60  | 159294.00    |                      | 53.77               | 154048.79    | 997534         | 53.77          | 53636614.71  | 4846980                    | 55.60                  | -1.42%                  | 0.00%          | 0.06%           | 0.06%            |
| 11-08-2022      | 0       | 0.00   | 0.00         | 637534  | 54.73  | 34891555.20  |                      | 53.77               | 34279699.26  | 360000         | 53.77          | 19356915.45  | 2779965                    | 53.80                  | -3.24%                  | 0.00%          | 22.93%          | 22.93%           |
| 14-08-2022      | 835000  | 55.78  | 46575927.00  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 1195000        | 55.17          | 65932842.45  | 3577978                    | 57.20                  | 6.32%                   | 23.34%         | 0.00%           | 23.34%           |
| 16-08-2022      | 800000  | 55.20  | 44160000.00  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 1995000        | 55.18          | 110092842.45 | 3968405                    | 57.70                  | 0.87%                   | 20.16%         | 0.00%           | 20.16%           |
| 28-08-2022      | 880025  | 55.80  | 49105395.00  | 100000  | 56.20  | 5619999.20   |                      | 55.37               | 5537281.85   | 2775025        | 55.37          | 153660955.60 | 3479367                    | 60.30                  | 1.69%                   | 25.29%         | 2.87%           | 28.17%           |
| 31-08-2022      | 0       | 0.00   | 0.00         | 250001  | 55.00  | 13750055.00  |                      | 55.37               | 13843259.99  | 2525024        | 55.37          | 139817695.61 | 1217838                    | 58.80                  | -2.81%                  | 0.00%          | 20.53%          | 20.53%           |
| 01-09-2022      | 0       | 0.00   | 0.00         | 139793  | 58.82  | 8222572.50   |                      | 55.37               | 7740732.41   | 2385231        | 55.37          | 132076963.20 | 884818                     | 58.70                  | -0.17%                  | 0.00%          | 15.80%          | 15.80%           |
| 05-09-2022      | 0       | 0.00   | 0.00         | 20000   | 56.80  | 1136000.00   |                      | 55.37               | 1107456.37   | 2365231        | 55.37          | 130969506.83 | 2665350                    | 62.70                  | 9.81%                   | 0.00%          | 0.75%           | 0.75%            |
| 11-09-2022      | 0       | 0.00   | 0.00         | 135652  | 72.16  | 9787987.50   |                      | 55.37               | 7511433.57   | 2229579        | 55.37          | 123458073.25 | 1321840                    | 73.70                  | 7.43%                   | 0.00%          | 10.26%          | 10.26%           |
| 18-09-2022      | 0       | 0.00   | 0.00         | 10000   | 94.00  | 940000.00    |                      | 55.37               | 553728.18    | 2219579        | 55.37          | 122904345.07 | 473076                     | 94.00                  | 9.94%                   | 0.00%          | 2.11%           | 2.11%            |
| 22-09-2022      | 0       | 0.00   | 0.00         | 23000   | 123.00 | 2829000.00   |                      | 55.37               | 1273574.83   | 2196579        | 55.37          | 121630770.24 | 2007441                    | 125.20                 | 9.63%                   | 0.00%          | 1.15%           | 1.15%            |
| 13-10-2022      | 1492343 | 143.90 | 214746847.90 | 1379382 | 142.29 | 196266566.00 |                      | 91.19               | 125780168.75 | 2309540        | 91.19          | 210597449.39 | 7166954                    | 146.90                 | -0.47%                  | 20.82%         | 19.25%          | 40.07%           |
| 16-10-2022      | 82477   | 145.60 | 12008384.80  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 2392017        | 93.06          | 222605834.19 | 1490536                    | 142.20                 | -3.20%                  | 5.53%          | 0.00%           | 5.53%            |
| 17-10-2022      | 0       | 0.00   | 0.00         | 50000   | 132.00 | 6600030.00   |                      | 93.06               | 4653098.92   | 2342017        | 93.06          | 217952735.28 | 1450210                    | 131.50                 | -7.52%                  | 0.00%          | 3.45%           | 3.45%            |
| 18-10-2022      | 0       | 0.00   | 0.00         | 10000   | 134.20 | 1342000.00   |                      | 93.06               | 930619.78    | 2332017        | 93.06          | 217022115.49 | 925852                     | 134.20                 | 2.05%                   | 0.00%          | 1.08%           | 1.08%            |
| 19-10-2022      | 0       | 0.00   | 0.00         | 43100   | 137.61 | 5931080.00   |                      | 93.06               | 4010971.27   | 2288917        | 93.06          | 213011144.23 | 2262407                    | 135.10                 | 0.67%                   | 0.00%          | 1.91%           | 1.91%            |
| 20-10-2022      | 100400  | 139.33 | 13988342.30  | 199997  | 125.00 | 24999625.00  |                      | 95.01               | 19000917.96  | 2189320        | 95.01          | 207998568.56 | 1189284                    | 139.60                 | 3.33%                   | 8.44%          | 16.82%          | 25.26%           |
| 23-10-2022      | 300000  | 135.00 | 40500000.00  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 2489320        | 99.83          | 248498568.56 | 2808577                    | 150.60                 | 7.88%                   | 10.68%         | 0.00%           | 10.68%           |
| 24-10-2022      | 0       | 0.00   | 0.00         | 30000   | 153.75 | 4612625.00   |                      | 99.83               | 2994776.51   | 2459320        | 99.83          | 245503792.06 | 961272                     | 153.10                 | 1.66%                   | 0.00%          | 3.12%           | 3.12%            |
| 25-10-2022      | 50750   | 154.59 | 7845236.90   | 50000   | 150.00 | 7500000.00   |                      | 100.93              | 5046652.66   | 2460070        | 100.93         | 248302376.29 | 1837458                    | 154.80                 | 1.11%                   | 2.76%          | 2.72%           | 5.48%            |
| 26-10-2022      | 51104   | 162.15 | 8286569.40   | 100100  | 149.81 | 14996178.60  |                      | 102.18              | 10228105.84  | 2411074        | 102.18         | 246360839.85 | 2858310                    | 168.70                 | 8.98%                   | 1.79%          | 3.50%           | 5.29%            |
| 27-10-2022      | 536756  | 168.84 | 90627829.20  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 2947830        | 114.32         | 336988669.05 | 3049412                    | 169.00                 | 0.18%                   | 17.60%         | 0.00%           | 17.60%           |
| 30-10-2022      | 550233  | 170.83 | 93996345.00  | 25000   | 160.00 | 4000000.00   |                      | 123.21              | 3080169.04   | 3473063        | 123.21         | 427904845.01 | 2426182                    | 173.70                 | 2.78%                   | 22.68%         | 1.03%           | 23.71%           |
| 31-10-2022      | 101046  | 187.65 | 18961387.50  | 100510  | 165.50 | 16634070.00  |                      | 125.03              | 12566635.50  | 3473599        | 125.03         | 434299597.01 | 2082485                    | 188.00                 | 8.23%                   | 4.85%          | 4.83%           | 9.68%            |
| 01-11-2022      | 100000  | 180.10 | 18010000.00  | 45000   | 188.54 | 8484389.00   |                      | 126.57              | 5695639.57   | 3528599        | 126.57         | 446613957.45 | 2311337                    | 190.40                 | 1.28%                   | 4.33%          | 1.95%           | 6.27%            |
| 03-11-2022      | 0       | 0.00   | 0.00         | 452257  | 186.59 | 84384435.00  |                      | 126.57              | 57242063.65  | 3076342        | 126.57         | 389371893.80 | 2010269                    | 184.30                 | -1.71%                  | 0.00%          | 22.50%          | 22.50%           |
| 06-11-2022      | 170912  | 175.48 | 29991321.80  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3247254        | 129.14         | 419363215.60 | 2215627                    | 174.70                 | -5.21%                  | 7.71%          | 0.00%           | 7.71%            |
| 07-11-2022      | 120001  | 187.39 | 22487147.10  | 25408   | 177.01 | 4497555.80   |                      | 131.22              | 3334031.43   | 3341847        | 131.22         | 438516331.26 | 1035839                    | 176.80                 | 1.20%                   | 11.58%         | 2.45%           | 14.04%           |
| 08-11-2022      | 7081    | 173.52 | 1228710.70   | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3348928        | 131.31         | 439745041.96 | 1007159                    | 169.20                 | -4.30%                  | 0.70%          | 0.00%           | 0.70%            |
| 09-11-2022      | 36795   | 167.56 | 6165353.20   | 18409   | 169.31 | 3116835.30   |                      | 131.70              | 2424523.35   | 3367314        | 131.70         | 443485871.81 | 876095                     | 158.50                 | -6.32%                  | 4.20%          | 2.10%           | 6.30%            |
| 10-11-2022      | 13651   | 163.70 | 2234713.00   | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3380965        | 131.83         | 445720584.81 | 883393                     | 174.30                 | 9.97%                   | 1.55%          | 0.00%           | 1.55%            |
| 13-11-2022      | 198000  | 187.73 | 37170000.00  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3578965        | 134.92         | 482890584.81 | 1612623                    | 181.30                 | 4.02%                   | 12.28%         | 0.00%           | 12.28%           |
| 14-11-2022      | 50000   | 189.00 | 9450000.00   | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3628965        | 135.67         | 492340584.81 | 1822038                    | 182.50                 | 0.66%                   | 2.74%          | 0.00%           | 2.74%            |
| 15-11-2022      | 0       | 0.00   | 0.00         | 158000  | 177.05 | 28100446.60  |                      | 135.67              | 21435812.25  | 3470965        | 135.67         | 470904772.56 | 805993                     | 180.40                 | -1.15%                  | 0.00%          | 19.60%          | 19.60%           |
| 21-11-2022      | 22811   | 176.36 | 4023041.90   | 23000   | 175.97 | 4047240.00   |                      | 135.94              | 3126514.04   | 3470776        | 135.94         | 471801300.42 | 334774                     | 176.10                 | -1.62%                  | 6.81%          | 6.87%           | 13.68%           |
| 23-11-2022      | 34371   | 179.44 | 6167477.00   | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3505147        | 136.36         | 477968777.42 | 613037                     | 179.80                 | -2.49%                  | 5.61%          | 0.00%           | 5.61%            |
| 24-11-2022      | 14000   | 179.76 | 2516700.00   | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3519147        | 136.53         | 480485477.42 | 864196                     | 177.60                 | -1.22%                  | 1.62%          | 0.00%           | 1.62%            |
| 27-11-2022      | 158660  | 181.33 | 28769340.00  | 29500   | 181.60 | 5367200.00   |                      | 138.47              | 4084775.82   | 3648307        | 138.47         | 505170041.60 | 635770                     | 178.50                 | 0.51%                   | 24.96%         | 4.64%           | 29.60%           |
| 28-11-2022      | 61480   | 176.58 | 10856068.50  | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3709787        | 139.10         | 516026110.10 | 547693                     | 175.90                 | -1.46%                  | 11.23%         | 0.00%           | 11.23%           |
| 29-11-2022      | 113510  | 182.90 | 20760821.10  | 59999   | 176.67 | 10599023.00  |                      | 140.40              | 8423797.34   | 3763298        | 140.40         | 528363133.86 | 991251                     | 183.80                 | 4.49%                   | 11.45%         | 6.05%           | 17.50%           |
| 30-11-2022      | 197460  | 182.39 | 36014346.00  | 9000    | 184.37 | 1659290.00   |                      | 142.49              | 1282430.62   | 3951758        | 142.49         | 563095049.24 | 731938                     | 187.10                 | 1.80%                   | 26.98%         | 1.23%           | 28.21%           |
| 01-12-2022      | 5000    | 178.70 | 893521.30    | 0       | 0.00   | 0.00         |                      | 0.00                | 0.00         | 3956758        | 142.54         | 563988570.54 | 691189                     | 178.40                 | -4.65%                  | 0.72%          | 0.00%           | 0.72%            |
| 04-12-2022      | 0       | 0.00   | 0.00         | 40055   | 175.06 | 7011981.10   |                      | 142.54              | 5709361.60   | 3916703        | 142.54         | 558279208.94 | 629388                     | 173.70                 | -2.63%                  | 0.00%          | 6.36%           | 6.36%            |
| 05-12-2022      | 0       | 0.00   | 0.00         | 870     | 175.60 | 152772.00    |                      | 142.54              | 124008.10    | 3915833        | 142.54         | 558155200.84 | 191490                     | 172.50                 | -0.69%                  | 0.00%          | 0.45%           | 0.45%            |



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|------------|--------|--------|--------------|--------|--------|--------------|--|--------|-------------|---------|--------|--------------|---------|--------|--------|--------|--------|--------|
| 06-12-2022 | 8375   | 176.83 | 1480913.80   | 30000  | 176.00 | 5280000.00   |  | 142.61 | 4278336.79  | 3894208 | 142.61 | 555357777.85 | 263830  | 177.10 | 2.67%  | 3.17%  | 11.37% | 14.55% |
| 14-12-2022 | 4264   | 170.32 | 726224.10    | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3898472 | 142.64 | 556084001.95 | 156484  | 172.20 | 1.35%  | 2.72%  | 0.00%  | 2.72%  |
| 15-12-2022 | 12764  | 171.55 | 2189603.00   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3911236 | 142.74 | 558273604.95 | 163814  | 169.80 | -1.39% | 7.79%  | 0.00%  | 7.79%  |
| 18-12-2022 | 4926   | 169.67 | 835814.70    | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3916162 | 142.77 | 559109419.65 | 203782  | 172.30 | 1.47%  | 2.42%  | 0.00%  | 2.42%  |
| 19-12-2022 | 24175  | 171.96 | 4157113.00   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3940337 | 142.95 | 563266532.65 | 205144  | 169.80 | -1.45% | 11.78% | 0.00%  | 11.78% |
| 20-12-2022 | 50     | 170.80 | 8540.00      | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3940387 | 142.95 | 563275072.65 | 114367  | 171.90 | 1.24%  | 0.04%  | 0.00%  | 0.04%  |
| 21-12-2022 | 81312  | 175.56 | 14275528.00  | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 4021699 | 143.61 | 577550600.65 | 1059747 | 182.50 | 6.17%  | 7.67%  | 0.00%  | 7.67%  |
| 22-12-2022 | 15100  | 189.91 | 2867630.00   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 4036799 | 143.78 | 580418230.65 | 1258808 | 190.70 | 4.49%  | 1.20%  | 0.00%  | 1.20%  |
| 26-12-2022 | 8000   | 189.86 | 1518900.00   | 26000  | 180.85 | 4702000.00   |  | 143.87 | 3740696.48  | 4018799 | 143.87 | 578196434.17 | 978443  | 186.60 | -2.15% | 0.82%  | 2.66%  | 3.47%  |
| 27-12-2022 | 14825  | 182.26 | 2702067.50   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 4033624 | 144.01 | 580898501.67 | 266749  | 186.40 | -0.11% | 5.56%  | 0.00%  | 5.56%  |
| 28-12-2022 | 50520  | 187.39 | 9467045.80   | 5120   | 170.00 | 870400.00    |  | 144.55 | 740099.17   | 4079024 | 144.55 | 589625448.30 | 353766  | 186.70 | 0.16%  | 14.28% | 1.45%  | 15.73% |
| 29-12-2022 | 16699  | 186.58 | 3115751.70   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 4095723 | 144.72 | 592741200.00 | 553780  | 186.70 | 0.00%  | 3.02%  | 0.00%  | 3.02%  |
| 04-01-2023 | 82441  | 196.84 | 16227917.90  | 28322  | 189.15 | 5357179.50   |  | 145.75 | 4127943.12  | 4149842 | 145.75 | 604841174.77 | 1579012 | 202.80 | 9.92%  | 5.22%  | 1.79%  | 7.01%  |
| 09-01-2023 | 0      | 0.00   | 0.00         | 16689  | 215.73 | 3600371.20   |  | 145.75 | 2432428.60  | 4133153 | 145.75 | 602408746.17 | 512717  | 212.00 | -0.93% | 0.00%  | 3.26%  | 3.26%  |
| 11-01-2023 | 0      | 0.00   | 0.00         | 30000  | 200.10 | 6003000.00   |  | 145.75 | 4372512.31  | 4103153 | 145.75 | 598036233.86 | 1665114 | 218.30 | 5.41%  | 0.00%  | 1.80%  | 1.80%  |
| 12-01-2023 | 0      | 0.00   | 0.00         | 65000  | 215.73 | 14022500.00  |  | 145.75 | 9473776.68  | 4038153 | 145.75 | 588562457.18 | 839048  | 223.00 | 2.15%  | 0.00%  | 7.75%  | 7.75%  |
| 15-01-2023 | 0      | 0.00   | 0.00         | 12801  | 213.91 | 2738215.00   |  | 145.75 | 1865751.00  | 4025352 | 145.75 | 586696706.18 | 1083167 | 227.60 | 2.06%  | 0.00%  | 1.18%  | 1.18%  |
| 16-01-2023 | 0      | 0.00   | 0.00         | 180    | 231.80 | 41724.00     |  | 145.75 | 26235.07    | 4025172 | 145.75 | 586670471.10 | 667706  | 229.80 | 0.97%  | 0.00%  | 0.03%  | 0.03%  |
| 19-01-2023 | 12999  | 203.50 | 2645296.50   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 4038171 | 145.94 | 589315767.60 | 1841712 | 228.30 | 2.51%  | 0.71%  | 0.00%  | 0.71%  |
| 22-01-2023 | 0      | 0.00   | 0.00         | 13000  | 234.62 | 3050100.00   |  | 145.94 | 1897172.01  | 4025171 | 145.94 | 587418595.59 | 1111662 | 245.00 | 7.31%  | 0.00%  | 1.17%  | 1.17%  |
| 23-01-2023 | 0      | 0.00   | 0.00         | 9000   | 248.90 | 2240120.00   |  | 145.94 | 1313426.77  | 4016171 | 145.94 | 586105168.82 | 883813  | 253.00 | 3.27%  | 0.00%  | 1.02%  | 1.02%  |
| 24-01-2023 | 0      | 0.00   | 0.00         | 50000  | 260.00 | 13000000.00  |  | 145.94 | 7296815.41  | 3966171 | 145.94 | 578808353.41 | 812064  | 273.70 | 8.18%  | 0.00%  | 6.16%  | 6.16%  |
| 26-01-2023 | 0      | 0.00   | 0.00         | 5500   | 281.48 | 1548114.70   |  | 145.94 | 802649.70   | 3960671 | 145.94 | 578005703.72 | 783785  | 275.10 | -3.07% | 0.00%  | 0.70%  | 0.70%  |
| 30-01-2023 | 0      | 0.00   | 0.00         | 5000   | 279.81 | 1399060.80   |  | 145.94 | 729681.54   | 3955671 | 145.94 | 577276022.18 | 459459  | 280.10 | -1.13% | 0.00%  | 1.09%  | 1.09%  |
| 31-01-2023 | 440074 | 270.36 | 118980002.20 | 438901 | 269.52 | 118293239.90 |  | 158.39 | 69518924.63 | 3956844 | 158.39 | 626737099.74 | 1873665 | 263.50 | -5.93% | 23.49% | 23.42% | 46.91% |
| 01-02-2023 | 0      | 0.00   | 0.00         | 68930  | 269.39 | 18569300.00  |  | 158.39 | 10918041.82 | 3887914 | 158.39 | 615819057.92 | 855142  | 269.20 | 2.16%  | 0.00%  | 8.06%  | 8.06%  |
| 02-02-2023 | 0      | 0.00   | 0.00         | 4371   | 253.36 | 1107421.00   |  | 158.39 | 692336.59   | 3883543 | 158.39 | 615126721.33 | 979436  | 271.00 | 0.67%  | 0.00%  | 0.45%  | 0.45%  |
| 05-02-2023 | 141050 | 278.12 | 39228810.00  | 140450 | 277.89 | 39029242.00  |  | 162.59 | 22835659.25 | 3884143 | 162.59 | 631519872.08 | 903688  | 261.60 | -3.47% | 15.61% | 15.54% | 31.15% |
| 06-02-2023 | 104000 | 268.56 | 27930000.00  | 256975 | 268.25 | 68933637.10  |  | 165.35 | 42491488.11 | 3731168 | 165.35 | 616958383.97 | 1932953 | 272.10 | 4.01%  | 5.38%  | 13.29% | 18.67% |
| 07-02-2023 | 0      | 0.00   | 0.00         | 139999 | 269.60 | 37743729.00  |  | 165.35 | 23149200.68 | 3591169 | 165.35 | 593809183.29 | 1671846 | 284.40 | 4.52%  | 0.00%  | 8.37%  | 8.37%  |
| 08-02-2023 | 300000 | 265.10 | 79530000.00  | 50625  | 278.00 | 14073750.00  |  | 173.04 | 8760297.01  | 3840544 | 173.04 | 664578886.28 | 1555248 | 298.90 | 5.10%  | 19.29% | 3.26%  | 22.54% |
| 09-02-2023 | 0      | 0.00   | 0.00         | 19050  | 277.76 | 5291400.00   |  | 173.04 | 3296467.32  | 3821494 | 173.04 | 661282418.96 | 792796  | 293.00 | -1.97% | 0.00%  | 2.40%  | 2.40%  |
| 12-02-2023 | 0      | 0.00   | 0.00         | 10000  | 288.69 | 2886874.00   |  | 173.04 | 1730429.04  | 3811494 | 173.04 | 659551989.92 | 715743  | 283.40 | -3.28% | 0.00%  | 1.40%  | 1.40%  |
| 15-02-2023 | 0      | 0.00   | 0.00         | 1000   | 277.45 | 277445.00    |  | 173.04 | 173042.90   | 3810494 | 173.04 | 659378947.02 | 573827  | 276.70 | -2.16% | 0.00%  | 0.17%  | 0.17%  |
| 19-02-2023 | 100000 | 278.00 | 27800000.00  | 4000   | 280.68 | 1122700.00   |  | 175.73 | 702907.56   | 3906494 | 175.73 | 686476039.46 | 527297  | 279.10 | 0.11%  | 18.96% | 0.76%  | 19.72% |
| 22-02-2023 | 0      | 0.00   | 0.00         | 9000   | 281.61 | 2534517.70   |  | 175.73 | 1581542.01  | 3897494 | 175.73 | 684894497.46 | 450978  | 285.10 | 1.93%  | 0.00%  | 2.00%  | 2.00%  |
| 23-02-2023 | 0      | 0.00   | 0.00         | 9400   | 288.14 | 2708520.00   |  | 175.73 | 1651832.76  | 3888094 | 175.73 | 683242664.69 | 573494  | 287.80 | 0.95%  | 0.00%  | 1.64%  | 1.64%  |
| 26-02-2023 | 0      | 0.00   | 0.00         | 16940  | 287.99 | 4878547.00   |  | 175.73 | 2976813.51  | 3871154 | 175.73 | 680265851.19 | 704429  | 280.70 | -2.47% | 0.00%  | 2.40%  | 2.40%  |
| 27-02-2023 | 0      | 0.00   | 0.00         | 18000  | 276.69 | 4980404.00   |  | 175.73 | 3163084.01  | 3853154 | 175.73 | 677102767.18 | 722688  | 277.30 | -1.21% | 0.00%  | 2.49%  | 2.49%  |
| 28-02-2023 | 50000  | 282.10 | 14104983.60  | 70700  | 281.02 | 19868146.00  |  | 177.09 | 12520230.56 | 3832454 | 177.09 | 678687520.22 | 900763  | 281.40 | 1.48%  | 5.55%  | 7.85%  | 13.40% |
| 01-03-2023 | 0      | 0.00   | 0.00         | 16354  | 280.09 | 4580520.00   |  | 177.09 | 2896122.36  | 3816100 | 177.09 | 675791397.86 | 903752  | 276.30 | -1.81% | 0.00%  | 1.81%  | 1.81%  |
| 02-03-2023 | 0      | 0.00   | 0.00         | 21000  | 274.80 | 5770761.10   |  | 177.09 | 3718880.36  | 3795100 | 177.09 | 672072517.50 | 985233  | 275.20 | -0.40% | 0.00%  | 2.13%  | 2.13%  |
| 05-03-2023 | 48003  | 274.87 | 13194524.60  | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3843103 | 178.31 | 685267042.10 | 3046347 | 290.60 | 5.60%  | 1.58%  | 0.00%  | 1.58%  |
| 06-03-2023 | 0      | 0.00   | 0.00         | 20000  | 296.79 | 5935805.00   |  | 178.31 | 3566217.41  | 3823103 | 178.31 | 681700824.69 | 1691460 | 306.00 | 5.30%  | 0.00%  | 1.18%  | 1.18%  |
| 07-03-2023 | 0      | 0.00   | 0.00         | 16400  | 314.90 | 5164439.80   |  | 178.31 | 2924298.28  | 3806703 | 178.31 | 678776526.41 | 1564610 | 313.30 | 2.39%  | 0.00%  | 1.05%  | 1.05%  |
| 09-03-2023 | 0      | 0.00   | 0.00         | 12000  | 316.00 | 3801613.20   |  | 178.31 | 2139730.45  | 3794703 | 178.31 | 676636795.96 | 822159  | 320.10 | 2.17%  | 0.00%  | 1.46%  | 1.46%  |
| 12-03-2023 | 0      | 0.00   | 0.00         | 18000  | 313.28 | 5639055.00   |  | 178.31 | 3209595.67  | 3776703 | 178.31 | 673427200.28 | 740580  | 311.80 | -2.59% | 0.00%  | 2.43%  | 2.43%  |
| 13-03-2023 | 0      | 0.00   | 0.00         | 3900   | 310.95 | 1212710.00   |  | 178.31 | 695412.40   | 3772803 | 178.31 | 672731787.89 | 543444  | 311.60 | -0.06% | 0.00%  | 0.72%  | 0.72%  |
| 16-03-2023 | 3394   | 308.20 | 1046023.80   | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3776197 | 178.43 | 673777811.69 | 1625237 | 308.20 | 4.30%  | 0.21%  | 0.00%  | 0.21%  |
| 23-03-2023 | 0      | 0.00   | 0.00         | 19991  | 315.58 | 6300054.30   |  | 178.43 | 3566946.38  | 3756206 | 178.43 | 670210865.31 | 1499564 | 316.90 | 4.21%  | 0.00%  | 1.33%  | 1.33%  |
| 27-03-2023 | 0      | 0.00   | 0.00         | 23000  | 308.68 | 7099554.40   |  | 178.43 | 4103835.07  | 3733206 | 178.43 | 666107030.24 | 581648  | 308.50 | -2.65% | 0.00%  | 3.95%  | 3.95%  |
| 29-03-2023 | 2000   | 299.75 | 599500.00    | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3735206 | 178.49 | 666706530.24 | 511444  | 293.50 | -3.07% | 0.39%  | 0.00%  | 0.39%  |
| 06-04-2023 | 0      | 0.00   | 0.00         | 1000   | 282.00 | 282000.00    |  | 178.49 | 178492.57   | 3734206 | 178.49 | 666528037.67 | 725665  | 281.20 | -2.56% | 0.00%  | 0.14%  | 0.14%  |
| 09-04-2023 | 95001  | 271.00 | 25745271.00  | 0      | 0.00   | 0.00         |  | 0.00   | 0.00        | 3829207 | 180.79 | 692273308.67 | 1010600 | 287.70 | 2.31%  | 9.40%  | 0.00%  | 9.40%  |
| 17-04-2023 | 0      | 0.00   | 0.00         | 3717   | 282.95 | 1051711.00   |  | 180.79 | 671987.67   | 3825490 | 180.79 | 691601321.00 | 499386  | 285.60 | 3.29%  | 0.00%  | 0.74%  | 0.74%  |



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|            |          |        |               |         |        |               |   |        |              |         |        |               |          |        |        |        |        |        |
|------------|----------|--------|---------------|---------|--------|---------------|---|--------|--------------|---------|--------|---------------|----------|--------|--------|--------|--------|--------|
| 18-04-2023 | 0        | 0.00   | 0.00          | 2500    | 292.00 | 730000.00     |   | 180.79 | 451969.11    | 3822990 | 180.79 | 691149351.89  | 866731   | 285.90 | 0.11%  | 0.00%  | 0.29%  | 0.29%  |
| 24-04-2023 | 83800    | 296.62 | 24856430.00   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 3906790 | 183.27 | 716005781.89  | 1563852  | 301.80 | 5.56%  | 5.36%  | 0.00%  | 5.36%  |
| 25-04-2023 | 21600    | 306.81 | 6627098.80    | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 3928390 | 183.95 | 722632880.69  | 1183857  | 303.50 | 0.56%  | 1.82%  | 0.00%  | 1.82%  |
| 03-05-2023 | 200000   | 251.17 | 50234866.70   | 194146  | 250.88 | 48707775.20   |   | 187.21 | 36345689.65  | 3934244 | 187.21 | 736522057.74  | 861399   | 250.60 | 0.32%  | 23.22% | 22.54% | 45.76% |
| 08-05-2023 | 0        | 0.00   | 0.00          | 4539    | 214.26 | 972522.20     |   | 187.21 | 849737.24    | 3929705 | 187.21 | 735672320.50  | 14172382 | 210.10 | -8.49% | 0.00%  | 0.32%  | 0.32%  |
| 11-05-2023 | 0        | 0.00   | 0.00          | 800     | 217.07 | 173653.00     |   | 187.21 | 149766.42    | 3928905 | 187.21 | 735522554.08  | 10406022 | 211.30 | -8.09% | 0.00%  | 0.08%  | 0.08%  |
| 25-05-2023 | 144334   | 236.00 | 34063257.90   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4073239 | 188.94 | 769585811.98  | 12136652 | 240.20 | 7.33%  | 11.89% | 0.00%  | 11.89% |
| 12-06-2023 | 0        | 0.00   | 0.00          | 40791   | 210.68 | 8594034.60    |   | 188.94 | 7706931.72   | 4032448 | 188.94 | 761878880.26  | 19844572 | 212.60 | -2.34% | 0.00%  | 2.06%  | 2.06%  |
| 10-07-2023 | 227000   | 217.00 | 49259000.00   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4259448 | 190.43 | 811137880.26  | 22919242 | 230.30 | 5.74%  | 9.90%  | 0.00%  | 9.90%  |
| 17-07-2023 | 0        | 0.00   | 0.00          | 218000  | 220.00 | 47960000.00   |   | 190.43 | 41514313.10  | 4041448 | 190.43 | 769623567.16  | 836513   | 219.00 | -2.28% | 0.00%  | 26.06% | 26.06% |
| 18-07-2023 | 320000   | 217.40 | 69568000.00   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4361448 | 192.41 | 839191567.16  | 2431898  | 217.40 | -0.73% | 13.16% | 0.00%  | 13.16% |
| 19-07-2023 | 20000    | 229.25 | 4585000.00    | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4381448 | 192.58 | 843776567.16  | 1742776  | 231.90 | 6.67%  | 1.15%  | 0.00%  | 1.15%  |
| 20-07-2023 | 37964    | 231.49 | 8788318.90    | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4419412 | 192.91 | 852564886.06  | 1156848  | 231.50 | -0.17% | 3.28%  | 0.00%  | 3.28%  |
| 24-07-2023 | 69427    | 228.54 | 15867072.20   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4488839 | 193.46 | 868431958.26  | 857524   | 228.80 | 0.04%  | 8.10%  | 0.00%  | 8.10%  |
| 25-07-2023 | 286328   | 236.37 | 67678140.80   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4775167 | 196.04 | 936110099.06  | 1616227  | 230.80 | 0.87%  | 17.72% | 0.00%  | 17.72% |
| 26-07-2023 | 34779    | 234.76 | 8164697.50    | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4809946 | 196.32 | 944274796.56  | 1247600  | 227.40 | -1.47% | 2.79%  | 0.00%  | 2.79%  |
| 30-07-2023 | 46718    | 220.36 | 10294893.20   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 4856664 | 196.55 | 954569689.76  | 1079483  | 220.00 | 0.50%  | 4.33%  | 0.00%  | 4.33%  |
| 01-08-2023 | 5450     | 209.35 | 1140976.60    | 10500   | 207.73 | 2181189.30    |   | 196.56 | 2063909.24   | 4851614 | 196.56 | 953646757.13  | 1133351  | 210.20 | -1.73% | 0.48%  | 0.93%  | 1.41%  |
| 02-08-2023 | 907939   | 210.55 | 191167171.50  | 505075  | 209.87 | 105999225.00  |   | 198.77 | 100392668.49 | 5254478 | 198.77 | 1044421260.13 | 2018400  | 220.90 | 5.09%  | 44.98% | 25.02% | 70.01% |
| 03-08-2023 | 9632     | 217.65 | 2096358.60    | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 5264110 | 198.80 | 1046517618.73 | 746428   | 214.70 | -2.81% | 1.29%  | 0.00%  | 1.29%  |
| 06-08-2023 | 57759    | 213.97 | 12358712.60   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 5321869 | 198.97 | 1058876331.33 | 577169   | 213.60 | -0.51% | 10.01% | 0.00%  | 10.01% |
| 07-08-2023 | 188000   | 205.16 | 38570000.00   | 0       | 0.00   | 0.00          |   | 0.00   | 0.00         | 5509869 | 199.18 | 1097446331.33 | 741880   | 213.10 | -0.23% | 25.34% | 0.00%  | 25.34% |
| 08-08-2023 | 44000    | 213.90 | 9411600.00    | 195000  | 200.25 | 39048400.00   |   | 199.29 | 38862511.27  | 5358869 | 199.29 | 1067995420.06 | 1508925  | 217.20 | 1.92%  | 2.92%  | 12.92% | 15.84% |
| 09-08-2023 | 0        | 0.00   | 0.00          | 575     | 218.60 | 125695.00     |   | 199.29 | 114594.58    | 5358294 | 199.29 | 1067880825.48 | 650377   | 211.50 | -2.62% | 0.00%  | 0.09%  | 0.09%  |
| 10-08-2023 | 0        | 0.00   | 0.00          | 20005   | 205.15 | 4104075.50    |   | 199.29 | 3986895.07   | 5338289 | 199.29 | 1063893930.41 | 545229   | 211.00 | -0.24% | 0.00%  | 3.67%  | 3.67%  |
| Total      | 12408967 | 156.86 | 1946440546.60 | 7070678 | 173.85 | 1229225827.30 | 0 | 124.82 | 882546616.19 | 5338289 | 199.29 | 1063893930.41 |          |        |        |        |        |        |

**c. Influence of Market Price of SEAPEARL by "LOUTFUL GONI TITU AND HIS ASSOCIATES":**

The enquiry team gathered trade monitoring screenshots from Surveillance Department pertaining to the public market trade of SEAPEARL conducted by "LOUTFUL GONI TITU AND HIS ASSOCIATES". The collected data reveals instances of active trading by this group on specific dates, exerting influence on the price of SEAPEARL by conducting trade by the following BOIDs:

[1201950064845550, 1205660064845550, 1602170064845550, 1201570073660878, 1201570073611471, 1201570074234392, 1201570074232417, 1201570074232152, 1201570074232516, 1201570074231696, 1201570074232706 (Combined)]

A demo of detailed information from the screenshots received from DSE surveillance system is as follows:



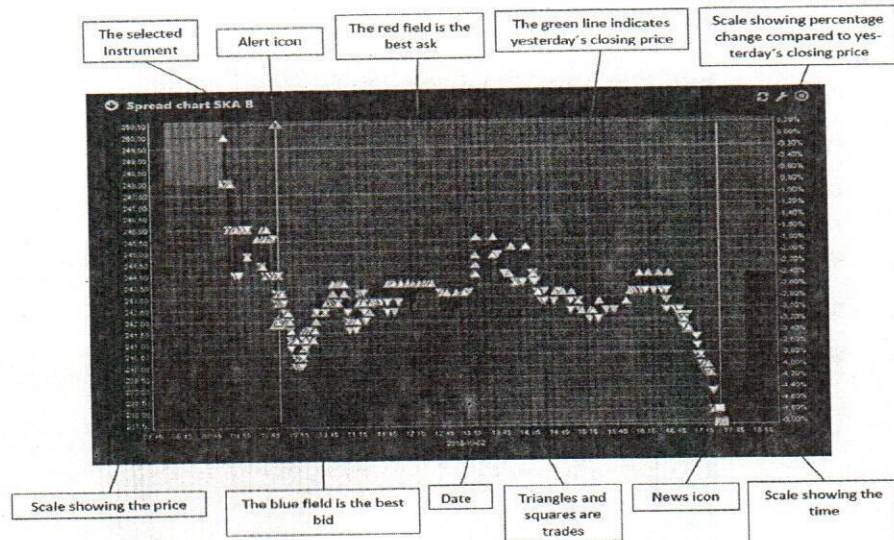
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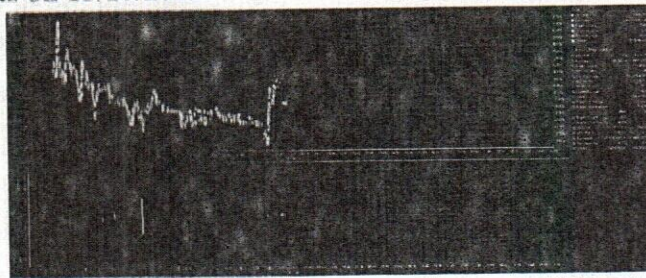
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- ▲ Green triangle represents trade of SEAPEARL by "Loutful Goni Titu and his associates"
- △ White triangle represents trade of SEAPEARL by other clients

After a thorough examination of the trade monitoring screenshots collected from the Surveillance Department, it has been determined that "Loutful Goni Titu and his associates" actively participated in the trading of SEAPEARL shares. Their involvement is noted to have influenced the price of these shares on several dates.

## Active Participation as on 13/10/2022:

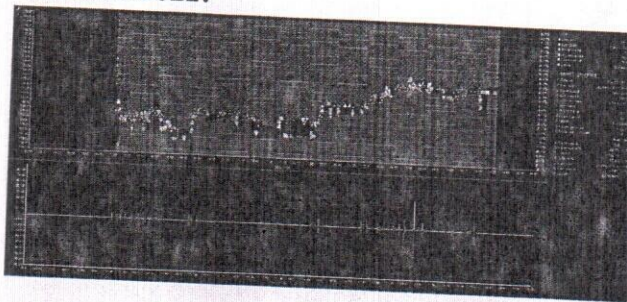


It was observed in the above graph that on 13-10-2022, total number of trades of SEAPEARL in the market was 3592, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 176 which is approximately 4.90% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 3,891,385 whereas buy volume by the said client(s) was 371,343 which is approximately 9.54% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 13-10-2022 in trading of SEAPEARL share.



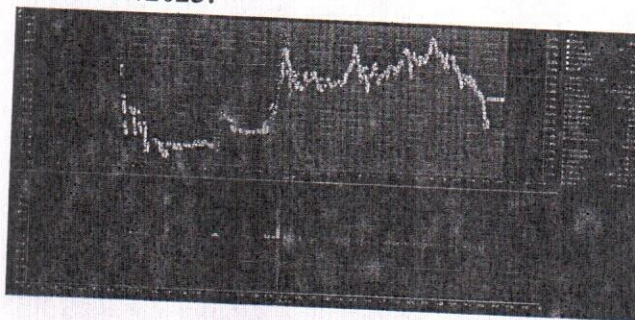
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**Active Participation as on 29/11/2022:**



It was observed in the above graph that on 29-11-2022, total number of trades of SEPEARL in the market was 1605, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 368 which is approximately 22.93% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 656,248 whereas buy volume by the said client(s) was 113,510 which is approximately 17.30% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 29-11-2022 in trading of SEPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

**Active Participation as on 25/07/2023:**



It was observed in the above graph that on 25-07-2023, total number of trades of SEPEARL in the market was 3921, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 302 which is approximately 7.70% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 1,306,227 whereas buy volume by the said client(s) was 183,428 which is approximately 14.04% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 25-07-2023 in trading of SEPEARL share.

**Active Participation as on 02/08/2023:**





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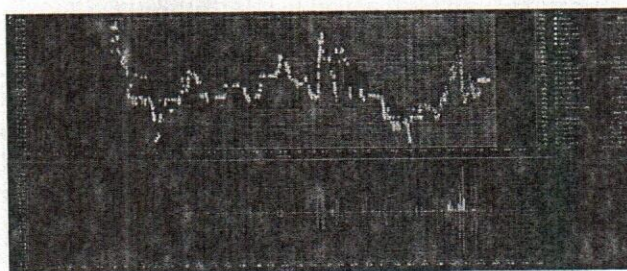
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It was observed in the above graph that on 02-08-2023, total number of trades of SEAPEARL in the market was 3613, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 140 which is approximately 3.87% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 998,917 whereas buy volume by the said client(s) was 41,939 which is approximately 4.20% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 02-08-2023 in trading of SEAPEARL share.

### Active Participation as on 06/08/2023:



It was observed in the above graph that on 06-08-2023, total number of trades of SEAPEARL in the market was 2282, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 246 which is approximately 10.78% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 469,757 whereas buy volume by the said client(s) was 57,759 which is approximately 12.30% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 06-08-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

### d. Manipulation:

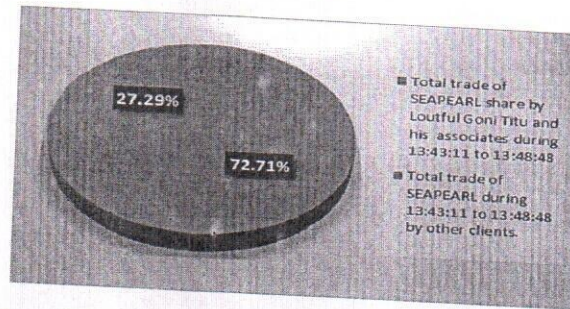
Manipulations of market price of SEAPEARL by LOUTFUL GONI TITU AND HIS ASSOCIATES are given below:

#### Manipulation of market price as on 13-10-2022:

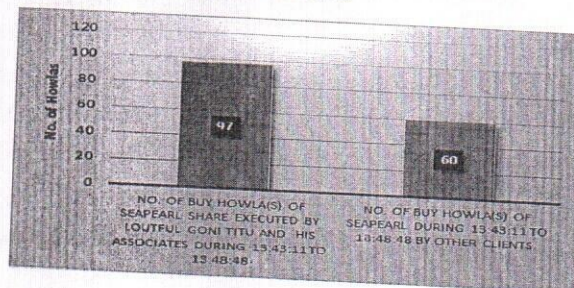
On 13-10-2022, trading of SEAPEARL share was started at Tk. 152.00 which is Tk. 4.40 more than the YCP of Tk. 147.60. On that day, Loutful Goni Titu and his associates started series of trading at 13:43:11 at price Tk. 135.00 and induced the same to rise to Tk. 151.80 up to 13:48:48. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 13:43:11 to 13:48:48, Loutful Goni Titu and his associates bought 64,377 shares of SEAPEARL compared to the total traded share of 88,542. This is shown in the following Pie Chart.



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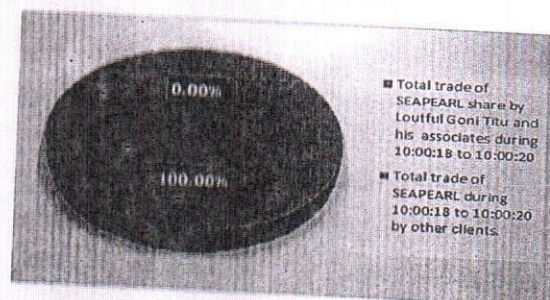
It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 97 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 157 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 72.71% of the total trades of SEAPEARL shares by executing 97 of total 157 howlas from 13:43:11 to 13:48:48 on 13-10-2022. From 13:43:11 to 13:48:48, Loutful Goni Titu and his associates induced the price to rise from Tk. 135.00 to Tk. 151.80. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share.

**Manipulation of market price as on 29-11-2022:**

On 29-11-2022, the trading of SEAPEARL shares commenced at Tk. 179.90, indicating a Tk. 4.00 increase from the Yearly Compound Percentage (YCP) of Tk. 175.90. Notably, on that day, Loutful Goni Titu and his associates initiated a series of trades starting at 10:00:18 with a price of Tk. 179.90, and influenced the price to rise to Tk. 185.80 by 10:00:20. The accompanying graph illustrates the substantial trades executed by Loutful Goni Titu and his associates during this specific time frame. It is noteworthy that from 10:00:18 to 10:00:20, Loutful Goni Titu and his associates purchased 7,550 shares of SEAPEARL, constituting the entire total traded shares of 7,550. This distribution is visually represented in the following Pie Chart.



*A*



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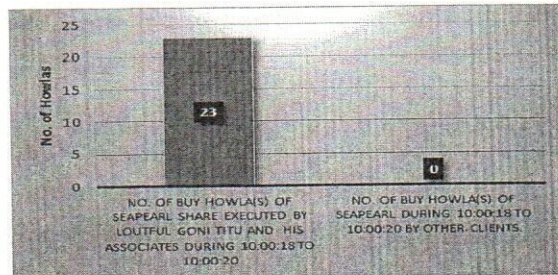
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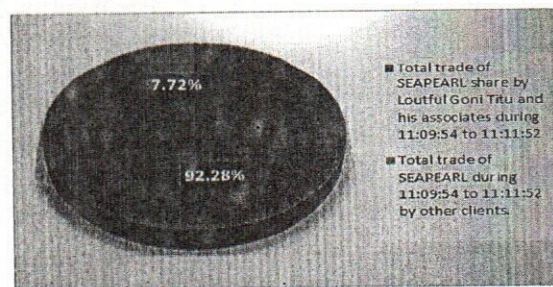
It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 23 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 23 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 100.00% of the total trades of SEAPEARL shares by executing 23 of total 23 howlas from 10:00:18 to 10:00:20 on 29-11-2022. From 10:00:18 to 10:00:20, Loutful Goni Titu and his associates induced the price to rise from Tk. 179.90 to Tk. 185.80. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 7.90 which is approximately 4.49% higher than YCP.

### Manipulation of market price as on 25-07-2023:

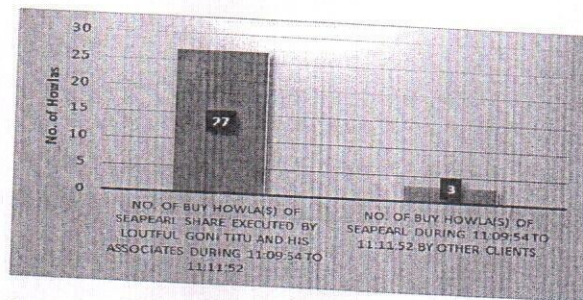
On 25-07-2023, trading of SEAPEARL share was started at Tk. 231.50 which is Tk. 2.70 more than the YCP of Tk. 228.80. On that day, Loutful Goni Titu and his associates started series of trading at 11:09:54 at price Tk. 226.70 and induced the same to rise to Tk. 229.20 up to 11:11:52. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 11:09:54 to 11:11:52, Loutful Goni Titu and his associates bought 21,039 shares of SEAPEARL compared to the total traded share of 22,799. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 27 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 30 as shown in the following Bar Chart:

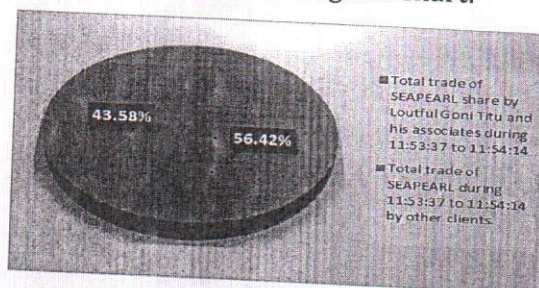


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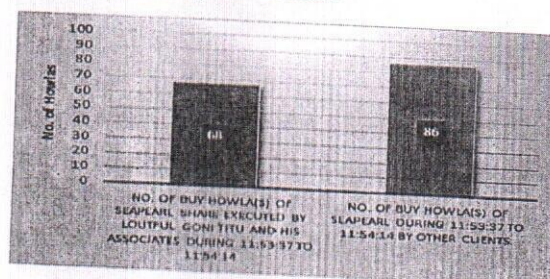


It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 92.28% of the total trades of SEPEARL shares by executing 27 of total 30 howlas from 11:09:54 to 11:11:52 on 25-07-2023. From 11:09:54 to 11:11:52, Loutful Goni Titu and his associates induced the price to rise from Tk. 226.70 to Tk. 229.20. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEPEARL share. At the end of the day price of SEPEARL share was increased by Tk. 2.00 which is approximately 0.87% higher than YCP.

On 25-07-2023, Loutful Goni Titu and his associates initiated a series of trades at 11:53:37 with a starting price of Tk. 232.90. They influenced the price to rise to Tk. 234.90 by 11:54:14, as depicted in the provided graph. Notably, Loutful Goni Titu and his associates executed significant trades during this specific time period. It is noteworthy that from 11:53:37 to 11:54:14, Loutful Goni Titu and his associates purchased 50,000 shares of SEPEARL, constituting a substantial portion of the total traded shares amounting to 88,620. This distribution is visually represented in the following Pie Chart:



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 68 howlas to purchase of shares of SEPEARL compared to the total number of howlas of 154 as shown in the following Bar Chart:





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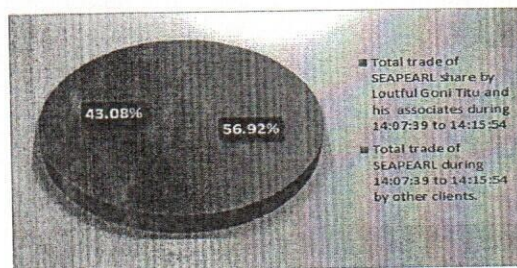
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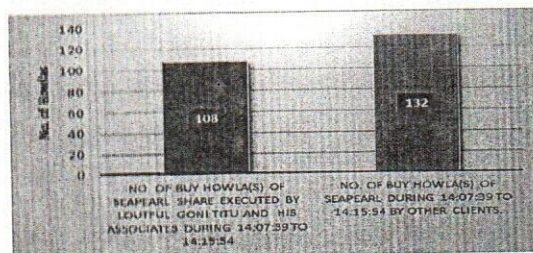
It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 56.42% of the total trades of SEAPEARL shares by executing 68 of total 154 howlas from 11:53:37 to 11:54:14 on 25-07-2023. From 11:53:37 to 11:54:14, Loutful Goni Titu and his associates induced the price to rise from Tk. 232.90 to Tk. 234.90. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share.

## Manipulation of market price as on 02-08-2023:

On 02-08-2023, trading of SEAPEARL share was started at Tk. 212.00 which is Tk. 1.80 more than the YCP of Tk. 210.20. On that day, Loutful Goni Titu and his associates started series of trading at 14:07:39 at price Tk. 218.90 and induced the same to rise to Tk. 222.30 up to 14:15:54. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 14:07:39 to 14:15:54, Loutful Goni Titu and his associates bought 32,739 shares of SEAPEARL compared to the total traded share of 57,515. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 108 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 240 as shown in the following Bar Chart.



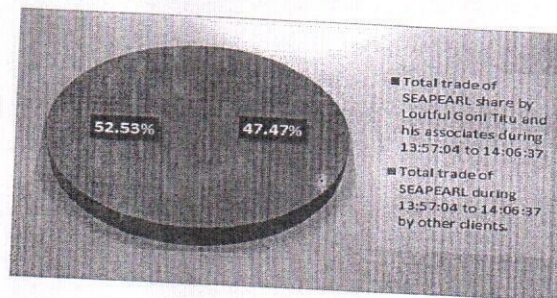
It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 56.92% of the total trades of SEAPEARL shares by executing 108 of total 240 howlas from 14:07:39 to 14:15:54 on 02-08-2023. From 14:07:39 to 14:15:54, Loutful Goni Titu and his associates induced the price to rise from Tk. 218.90 to Tk. 222.30. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 10.70 which is approximately 5.09% higher than YCP.



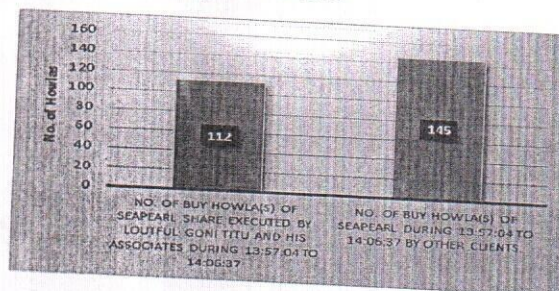
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**Manipulation of market price as on 06-08-2023:**

On 06-08-2023, trading of SEAPEARL share was started at Tk. 216.00 which is Tk. 1.30 more than the YCP of Tk. 214.70. On that day, Loutful Goni Titu and his associates started series of trading at 13:57:04 at price Tk. 213.00 and induced the same to rise to Tk. 215.00 up to 14:06:37. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 13:57:04 to 14:06:37, Loutful Goni Titu and his associates bought 30,732 shares of SEAPEARL compared to the total traded share of 64,738. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 112 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 257 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 47.47% of the total trades of SEAPEARL shares by executing 112 of total 257 howlas from 13:57:04 to 14:06:37 on 06-08-2023. From 13:57:04 to 14:06:37, Loutful Goni Titu and his associates induced the price to rise from Tk. 213.00 to Tk. 215.00. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share.

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## e. Public Market Internal Transection:

### Report of internal transection of sea pearl (Public Market)

| Buyer Name                      | Buyer BOID       | Seller Name           | Seller BOID      | No. Transaction | Trade Volume | Trade Amount | Market Type |
|---------------------------------|------------------|-----------------------|------------------|-----------------|--------------|--------------|-------------|
| Shatrong Agro Fisheries Limited | 1201950064845550 | Amanat Agro Fisharise | 1201570074232152 | 11              | 118000       | 29641600     | Public      |
| Shatrong Agro Fisheries Limited | 1201950064845550 | Hasan nursery         | 1201570074232417 | 10              | 46546        | 11692355     | Public      |
| Shatrong Agro Fisheries Limited | 1201950064845550 | Hasan nursery         | 1201570074232417 | 6               | 28500        | 5175600      | Public      |

- Buyer: Shatrong Agro Fisheries Limited (1201950064845550) and seller: Amanat Agro Fisharise (1201570074232152) 11 internal transactions of 118,000 volume of share amounting Tk. 29,641,600, Hasan nursery (1201570074232417) 10 internal transactions of 46,546 volume of share amounting Tk. 11,692,355.
- Buyer: Shatrong Agro Fisheries Limited (1602170064845550) seller: Hasan nursery (1201570074232417) 6 internal transactions of 28,500 volume of share amounting Tk. 5,175,600.

## f. Total Gain and Loss by Loutful Goni Titu and his associates form 01.07.2022 to 10.08.2023

| 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        |
| 6373979   | 157.82 | 1005969786.60 | 3881881    | 176.03 | 683316884.30 | 12408967  | 156.86 | 1946440546.60 | 7070678    | 173.85 | 1229225827.30 | 124.82              | 882546616.19 | 5338289        | 199.29 | 1063893930.41 |

|                                     |                 |                                                                            |
|-------------------------------------|-----------------|----------------------------------------------------------------------------|
| Realized Capital gain(loss)per unit | 49.03           | Average Sale Price - Average Cost Price                                    |
| Realized Capital gain(loss)%        | 39.28%          | Gain (loss) Per Unit/Cost Per Unit                                         |
| Realized Capital gain(loss)TK       | 34,66,79,211.11 | Total Sale Quantity x Gain (loss) Per Unit                                 |
| Closing Price (10-08-2023)          | 211.00          | Closing Price of Last Investigation Date                                   |
| Unrealized gain(loss) per unit      | 11.71           | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) %             | 5.87%           | Unrealized gain (loss) per unit /Average Price of Stock Position           |
| Unrealized gain(loss) TK            | 6,24,85,048.59  | Quantity of Stock Positon x Unrealized gain (loss) per unit                |



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**Individual Gain-Loss of Hasan Nursery:**

**I. Gain and Loss by "Hasan Nursery" from 01.07.2022 to 10.08.2023:**

|                                     |              |                                                                            |
|-------------------------------------|--------------|----------------------------------------------------------------------------|
| Realized Capital gain(loss)per unit | -1.45        | Average Sale Price - Average Cost Price                                    |
| Realized Capital gain(loss)%        | -0.63%       | Gain (loss) Per Unit/Cost Per Unit                                         |
| Realized Capital gain(loss)TK       | -7,06,668.38 | Total Sale Quantity x Gain (loss) Per Unit                                 |
| Closing Price (10-08-2023)          | 211.00       | Closing Price of Last Investigation Date                                   |
| Unrealized gain(loss) per unit      | 4.56         | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) %             | 2.21%        | Unrealized gain (loss) per unit /Average Price of Stock Position           |
| Unrealized gain(loss) TK            | 7,92,147.58  | Quantity of Stock Positon x Unrealized gain (loss) per unit                |

**Contraventions:**

Mr. LOUTFUL GONI TITU with his associates i.e. Shatrang Agro Fisheries Limited, Ridoy Poultry Firm, Hasan Nursery, Amanat Agro Fisharies, Sabbir Store, Sarker Agro Farm, Mukta Fisharies, Md. Abu Nayeem and Kamrul Hasan Md. Iqbal Goni manipulated the market price of shares of SEAPEARL by conducting active and aggressive trading jointly and made huge capital gain by deceiving general investors. Thus, "Hasan Nursery" has violated the followings:

- 1) **Section 17(e)(v) of Securities and Exchange Ordinance, 1969** by directly or indirectly effecting a series of transactions in the shares of 'SEAPEARL' creating the appearance of active trading therein and raising price of the said share.
- 2) **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969** by executing trades that created a false and misleading appearance of active trading in security.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ১৫, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৩৫২ স্মারকমূলে Loutful Goni Titu and His Associates (associates are Shatrang Agro Fisheries Ltd., Mr. Kamrul Hasan Md. Iqbal Goni, Md. Abu Nayeem, Ridoy Poultry Firm, Hasan Nursery, Amanat Agro Fisheries, Sabbir Store, Sarker Agro Farm and Mukta Fisheries)-কে মে ০৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত জুন ০৯, ২০২৪ তারিখে শুনানীতে Hasan Nursery-এর পক্ষে Mr. Md. Loutful Goni Titu (on behalf) উপস্থিত হয়ে জুন ০৯, ২০২৪ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

*"Please note that I invested in the shares of 'SEAPEARL' at my own discretion keeping in the mind that the Capital Market investment is subject to risk of gain/loss. Moreover, I tried my best to acquire proper knowledge, information and experience regarding different aspects and matters of Capital Market and none is directly or indirectly responsible for my said investment decisions or gain/loss whatsoever*

*It is pertinent to mention that it is not possible for me to submit written explanation regarding the queries made by you and request your lenient view against the inadvertent trade mistakes made by me"*





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যেহেতু, Hasan Nursery-এর উল্লিখিত বক্তব্য এবং অনুসন্ধান প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকাণ্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Hasan Nursery-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Hasan Nursery-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) এবং Section 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

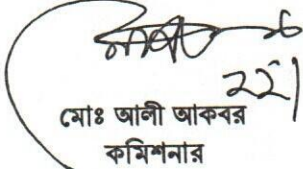
যেহেতু, Hasan Nursery-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Hasan Nursery-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-

- Hasan Nursery-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা এবং Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা সর্বমোট ২.০০ (দুই) লক্ষ টাকা অর্থদন্ড ধার্য 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,

  
22/08/2024  
মোঃ আলী আকবর  
কমিশনার

## বিতরণ:

- ১। Hasan Nursery  
(BOID: 1201570074232417)  
Dorirampur, Trishal  
Maymenshing.