

**Bangladesh Securities and Exchange Commission**  
Enforcement Division  
Enforcement Department  
Market, Market Intermediaries and Other Affairs Section  
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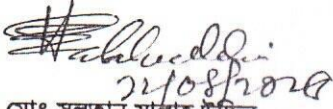
নং-বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৬০৯  
তারিখঃ এপ্রিল ২২, ২০২৫

**Monarch Holdings Ltd.**  
(BOID: 1605110071212010)  
10/B, Arambagh, (1st Floor), Dhaka-1000.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৬০৮ 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। [SEC/MSI/2003-227 (Volume 02 & 03)]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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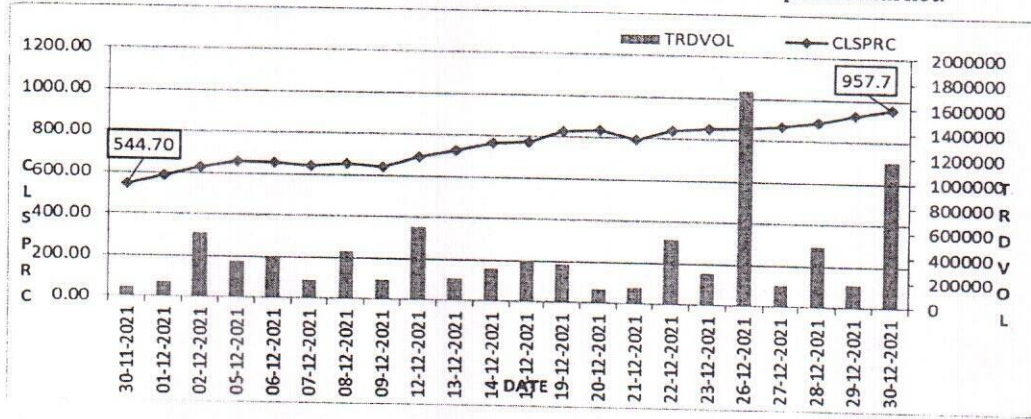
তারিখঃ এপ্রিল ২২, ২০২৫

**আদেশ**

যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, জানুয়ারি ০৩, ২০২২ তারিখের Surveillance Note-01/2022 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০১.১২.২০২১ থেকে ৩১.১২.২০২১ পর্যন্ত সময়ে Sonali Paper & Board Mills Limited (SONALIPAPR)-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 'SONALIPAPR' in public market:**



YCP of the shares of SONALIPAPR as on 01-12-2021 was Tk. 544.70 and closing price of the same was Tk. 957.7 as on 30-12-2021. During this period from 01.12.2021 to 30.12.2021, price of the shares of 'SONALIPAPR' was increased by Tk. 413 which is approximately 75.82% higher compared to Closing Price of 30-12-2021.

**A. Top Traders:**

**I. Major buyers of the period (Both Public and Block Market):**

The price of the shares of 'SONALIPAPR' was increased by 75.82% from 01.12.2021 to 30.12.2021. The Major buyers of the period were as follows:

| Sl. No. | Client Code | Client Name           | BO ID            | Name of 'TREC' Holder               | Buy Quantity | Sell Quantity | Total Trade | Total Trade Volume in the market | % of total Trade |
|---------|-------------|-----------------------|------------------|-------------------------------------|--------------|---------------|-------------|----------------------------------|------------------|
| 1       | S11334      | Genex Infosys Ltd     | 1605530074472175 | Southeast Bank Capital Services Ltd | 725690       | 449286        | 1174976     | 9758615                          | 12.04            |
| 2       | 1690        | Fortune Shoes Limited | 1205950073681925 | NRBC Bank Securities Limited        | 596365       | 569123        | 1165488     | 9758615                          | 11.94            |
| 3       | T8505       | Genex Infosys Ltd     | 1605540074007220 | Trust Bank Investment Limited       | 528014       | 304010        | 832024      | 9758615                          | 8.53             |
| 4       | S11118      | Md. Abul Khayer       | 1605530052137148 | Southeast Bank Capital Services Ltd | 493659       | 284838        | 778497      | 9758615                          | 7.98             |
| 5       | ABM663      | Abul Kalam Matber     | 1605110073447222 | Agrani Equity & Investment Ltd      | 414888       | 351500        | 766388      | 9758615                          | 7.85             |



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|    |        |                                                    |                  |                                     |        |        |        |         |      |
|----|--------|----------------------------------------------------|------------------|-------------------------------------|--------|--------|--------|---------|------|
| 6  | 100    | Abul Commercial Bank Ltd                           | 1205950052123209 | NRBC Bank Securities Limited        | 412838 | 361200 | 774038 | 9758615 | 7.93 |
| 7  | S11321 | Candlestone Investment Partner Limited Planner Ac  | 1605530074250439 | Southeast Bank Capital Services Ltd | 331500 | 158500 | 490000 | 9758615 | 5.02 |
| 8  | 10030  | Liz Fashion Industry Limited                       | 1205590073810108 | UCB Stock Brokerage Limited         | 270379 | 166038 | 436417 | 9758615 | 4.47 |
| 9  | S11322 | Candlestone Investments Partner Management Account | 1605530074255415 | Southeast Bank Capital Services Ltd | 246500 | 139741 | 386241 | 9758615 | 3.96 |
| 10 | 9166   | Abul Kalam Matber                                  | 1205590073447222 | UCB Stock Brokerage Limited         | 231000 | 85794  | 316794 | 9758615 | 3.25 |
| 11 | 3898   | Kazi Sadia Hasan                                   | 1205590068284973 | UCB Stock Brokerage Limited         | 190183 | 316240 | 506423 | 9758615 | 5.19 |
| 12 | S2131  | Kazi Sadia Hasan                                   | 1604530066385504 | SBL Capital Management Limited      | 180463 | 0      | 180463 | 9758615 | 1.85 |
| 13 | 82     | Nrbc Bank Securities Limited                       | 1205950062197150 | NRBC Bank Securities Limited        | 180347 | 180347 | 360694 | 9758615 | 3.70 |
| 14 | 2745   | Must Communication                                 | 1205600072900814 | Standard Bank Securities Limited    | 156500 | 99500  | 256000 | 9758615 | 2.62 |
| 15 | T8510  | Genex Infrastructure Limited                       | 1605540074366777 | Trust Bank Investment Limited       | 151000 | 151000 | 302000 | 9758615 | 3.09 |
| 16 | 43816  | Softavion Ltd.                                     | 1201950067588060 | EBL Securities Limited              | 141511 | 12000  | 153511 | 9758615 | 1.57 |
| 17 | ABM650 | S. M. Parvez Tamal                                 | 1605110064815088 | Agrani Equity & Investment Ltd      | 139009 | 0      | 139009 | 9758615 | 1.42 |
| 18 | 10     | Trust Investment Ltd. (Recovery Portfolio)         | 1205660051158541 | Trust Bank Securities Limited       | 136548 | 26616  | 163164 | 9758615 | 1.67 |
| 19 | 1689   | Md. Abul Khayer                                    | 1205950071091116 | NRBC Bank Securities Limited        | 121500 | 0      | 121500 | 9758615 | 1.25 |
| 20 | S2142  | Shakib Al Hasan                                    | 1604530069585574 | SBL Capital Management Limited      | 118415 | 16700  | 135115 | 9758615 | 1.38 |

## Findings:

- After analyzing documents, it is observed that **Mr. Abul Khayer** (Client code # S11118 of Southeast Bank Capital Services Ltd.), the 4<sup>th</sup> top buyer was associated with the following:
  - His father and 5<sup>th</sup> & 10<sup>th</sup> top buyer named **Mr. Abul Kalam Matber** (client code # ABM663 of Agrani Equity & Investment Limited, 9166 of UCB Stock Brokerage Limited, 43878 of EBL Securities Limited and 08003 of IIDFC Securities Limited),
  - His wife and 11<sup>th</sup> & 12<sup>th</sup> top buyer named **Ms. Kazi Sadia Hasan** (Client code # 3998 of UCB Stock Brokerage Limited, S2131 of SBL Capital Management Ltd, 43685 of EBL Securities Ltd),
  - The Softavion Ltd. (client code # 43816 of EBL Securities Limited), the 16<sup>th</sup> top buyer,
  - His brother, named **Sajed Madbar** (client code # 10057 of UCB Stock Brokerage Limited) and Mohammad Basher (Client code # 10058 of UCB Stock Brokerage Limited),
  - His sister, named **Konika Afroze** (client code # S2194 of SBL Capital Management Limited),
  - His Brother-In-Law, named **Kazi Farid Hasan** (Client code # 9177 of UCB Stock Brokerage Limited, S11331 of Southeast Bank Capital Services Ltd., 08013 of IIDFC Securities Limited),
  - Mr. Javeed A Matin (client code # S11295 of Southeast Bank Capital Services Ltd.), the director of Monarch Holdings Limited.
  - The D I T Co-Operative Ltd. (client code # 7022 of UCB Stock Brokerage Limited, 1688 of NRBC Bank Securities Limited, S2116 of SBL Capital Management Limited),
  - The Monarch Hotel & Resorts Ltd. (client code # N019 of UCB Investment Limited), Monarch Holdings Limited (Client code # ABM646 of Agrani Equity & Investment Limited) in trading shares of "SONALIPAPR" during the investigation period.





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In addition to the above mentioned accounts, it is also observed that **Mr. Abul Khayer** has also participated in trading the shares of aforementioned company along with 04 (four) more accounts maintained in his name (Client code # 1689 of NRBC Bank Securities Limited, the top 15<sup>th</sup> top buyer, client code # 7647 of UCB Stock Brokerage Limited, ABM645 of Agrani Equity & Investment Limited and V01550 of Vertex Stock and Securities Limited).

However, with these **30 (Thirty) accounts**, they jointly traded **44.56%** shares of "SONALIPAPR" during the investigation period.

**II. Major sellers of the period (Both Public and Block Market):**

The list of major sellers of shares of 'SONALIPAPR' from 01.12.2021 to 30.12.2021 are as follows:

| Sl. No. | Client Code | Client Name                                        | BO ID            | Name of TREC Holder                 | Buy Quantity | Sell Quantity | Total Trade | Total Trade Volume in the market | % of total Trade |
|---------|-------------|----------------------------------------------------|------------------|-------------------------------------|--------------|---------------|-------------|----------------------------------|------------------|
| 1       | 1690        | Fortune Shoes Limited                              | 1205950073681925 | NRBC Bank Securities Limited        | 596365       | 569123        | 1165488     | 9758615                          | 11.94            |
| 2       | S11334      | Genex Infosys Ltd                                  | 1605530074472175 | Southeast Bank Capital Services Ltd | 725690       | 449286        | 1174976     | 9758615                          | 12.04            |
| 3       | 100         | NRB Commercial Bank Ltd.                           | 1205950052123209 | NRBC Bank Securities Limited        | 412838       | 361200        | 774038      | 9758615                          | 7.93             |
| 4       | ABM663      | Abul Kalam Matber                                  | 1605110073447222 | Agrani Equity & Investment Ltd      | 414888       | 351500        | 766388      | 9758615                          | 7.85             |
| 5       | 3898        | Kazi Sadia Hasan                                   | 1205590068284973 | UCB Stock Brokerage Limited         | 190183       | 316240        | 506423      | 9758615                          | 5.19             |
| 6       | T8505       | Genex Infosys Ltd                                  | 1605540074007220 | Trust Bank Investment Limited       | 528014       | 304010        | 832024      | 9758615                          | 8.53             |
| 7       | S11118      | Md. Abul Khayer                                    | 1605530052137148 | Southeast Bank Capital Services Ltd | 493659       | 284838        | 778497      | 9758615                          | 7.98             |
| 8       | ABM646      | Monarch Holdings Limited                           | 1605110071212010 | Agrani Equity & Investment Ltd      | 79660        | 270699        | 350359      | 9758615                          | 3.59             |
| 9       | T9000       | Trust Bank Inv Ltd. I/A: T9000                     | 1605540073702660 | Trust Bank Investment Limited       | 0            | 229938        | 229938      | 9758615                          | 2.36             |
| 10      | S11292      | Abul Kashem                                        | 1605530073703127 | Southeast Bank Capital Services Ltd | 0            | 193600        | 193600      | 9758615                          | 1.98             |
| 11      | 82          | Nrb Bank Securities Limited                        | 1205950062197150 | NRBC Bank Securities Limited        | 180347       | 180347        | 360694      | 9758615                          | 3.70             |
| 12      | 10030       | Liz Fashion Industry Limited                       | 1205590073810108 | UCB Stock Brokerage Limited         | 270379       | 166038        | 436417      | 9758615                          | 4.47             |
| 13      | S11321      | Candiestone Investment Partner Limited Planner Ac  | 1605530074250439 | Southeast Bank Capital Services Ltd | 331500       | 158500        | 490000      | 9758615                          | 5.02             |
| 14      | T8510       | Genex Infrastructure Limited                       | 1605540074366777 | Trust Bank Investment Limited       | 151000       | 151000        | 302000      | 9758615                          | 3.09             |
| 15      | 1655        | S.M. Parvez Tamal                                  | 1205950073601539 | NRBC Bank Securities Limited        | 0            | 140000        | 140000      | 9758615                          | 1.43             |
| 16      | S11322      | Candiestone Investments partner Management Account | 1605530074255415 | Southeast Bank Capital Services Ltd | 246500       | 139741        | 386241      | 9758615                          | 3.96             |
| 17      | 17          | Trust Bank Investment Ltd.                         | 1205660044643924 | Trust Bank Securities Limited       | 107138       | 102830        | 209968      | 9758615                          | 2.15             |
| 18      | S11331      | Kazi Farid Hasan                                   | 1605530073684359 | Southeast Bank Capital Services Ltd | 0            | 100000        | 100000      | 9758615                          | 1.02             |
| 19      | 2745        | Must Communication                                 | 1205600072900814 | Standard Bank Securities Limited    | 156500       | 99500         | 256000      | 9758615                          | 2.62             |
| 20      | S11295      | Javeed A Matin                                     | 1605530069025711 | Southeast Bank Capital Services Ltd | 0            | 90000         | 90000       | 9758615                          | 0.92             |





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## **B. Trading of Mr. Md. Abul khayer and his associates:**

### **Observation(s)-1:**

Mr. Md. Abul Khayer (client code # S11118 & BOID # 1605530052137148 of Southeast Bank Capital Services Limited) was the 4<sup>th</sup> top buyer of shares of "SONALIPAPR" from the period of 01.12.2021 to 30.12.2021. After examining the relevant documents, it was also observed that the said client participated in trading of shares of "SONALIPAPR" in association with 33 (Thirty-Three) accounts more in the name of his family members and institutions and the details of the same is delineated as follows:

| Sl. No. | Client Name                  | Client Code | BO ID            | Name of TREC Holder                 | Remarks                                                                                             |
|---------|------------------------------|-------------|------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------|
| 1       | MD. ABUL KHAYER              | S11118      | 1605530052137148 | Southeast Bank Capital Services Ltd | The client himself and the operator of the group                                                    |
| 2       | MD. ABUL KHAYER              | 1689        | 1205950071091116 | NRBC Bank Securities Limited        |                                                                                                     |
| 3       | MD. ABUL KHAYER              | 7647        | 1205590071091116 | UCB Stock Brokerage Limited         |                                                                                                     |
| 4       | MD. ABUL KHAYER              | ABM645      | 1605110071091116 | Agrani Equity & Investment Limited  |                                                                                                     |
| 5       | MD. ABUL KHAYER              | V01550      | 1206080071091116 | Vertex Stock and Securities Limited |                                                                                                     |
| 6       | ABUL KALAM MATBER            | ABM663      | 1605110073447222 | Agrani Equity & Investment Limited  | Father of Mr. Md. Abul Khayer                                                                       |
| 7       | ABUL KALAM MATBER            | 9166        | 1205590073447222 | UCB Stock Brokerage Limited         |                                                                                                     |
| 8       | Abul Kalam Matber            | 43878       | 1201950068001021 | EBL Securities Limited              |                                                                                                     |
| 9       | ABUL KALAM MATBER            | 08003       | 1204480068636491 | IIDFC Securities Limited            | Wife of Mr. Md. Abul Khayer                                                                         |
| 10      | KAZI SADIA HASAN             | 3898        | 1205590068284973 | UCB Stock Brokerage Limited         |                                                                                                     |
| 11      | Kazi Sadia Hasan             | S2131       | 1604530066385504 | SBL Capital Management Limited      |                                                                                                     |
| 12      | Kazi Sadia Hasan             | 43685       | 1201950066385504 | EBL Securities Limited              | Brother of Mr. Md. Abul Khayer                                                                      |
| 13      | SAJED MADBAR                 | 10057       | 1205590073870641 | UCB Stock Brokerage Limited         |                                                                                                     |
| 14      | MOHAMMAD BASHER              | 10058       | 1205590073870821 | UCB Stock Brokerage Limited         | Sister of Mr. Abul Khayer                                                                           |
| 15      | KONIKA AFROZE                | S2194       | 1604530072553290 | SBL Capital Management Limited      | Brother in law of Mr. Md. Abul Khayer                                                               |
| 16      | KAZI FARID HASAN             | 9177        | 1205590073684359 | UCB Stock Brokerage Limited         |                                                                                                     |
| 17      | KAZI FARID HASAN             | S11331      | 1605530073684359 | Southeast Bank Capital Services Ltd | Business entity owned and operated by Mr. Md. Abul Khayer                                           |
| 18      | KAZI FARID HASAN             | 08013       | 1204480068944961 | IIDFC Securities Limited            |                                                                                                     |
| 19      | D I T CO-OPERATIVE LTD.      | 7022        | 1205590065757811 | UCB Stock Brokerage Limited         |                                                                                                     |
| 20      | D I T CO-OPERATIVE LTD.      | 1688        | 1205590065757811 | NRBC Bank Securities Limited        | Both Shakib Al Hasan and Mr. Javed A Matin is the director and Chairman of Monarch Holdings Limited |
| 21      | D I T CO-OPERATIVE LTD.      | S2116       | 1604530065757811 | SBL Capital Management Limited      |                                                                                                     |
| 22      | MONARCH HOTEL & RESORTS LTD. | N019        | 1606150074345644 | UCB Investment Limited              |                                                                                                     |
| 23      | MONARCH HOLDINGS LIMITED     | ABM646      | 1605110071212010 | Agrani Equity & Investment Limited  |                                                                                                     |
| 24      | Softavion Ltd.               | 43816       | 1201950067588060 | EBL Securities Limited              |                                                                                                     |
| 25      | SHAKIB AL HASAN              | S2142       | 1604530069585574 | SBL Capital Management Limited      |                                                                                                     |
| 26      | SHAKIB AL HASAN              | 45050       | 1201950064976237 | EBL Securities Limited              |                                                                                                     |
| 27      | Shakib Al Hasan              | 45800       | 1201950074169484 | EBL Securities Limited              |                                                                                                     |
| 28      | SHAKIB AL HASAN              | 08049       | 1204480064976237 | IIDFC Securities Limited            |                                                                                                     |
| 29      | SHAKIB AL HASAN              | S11294      | 1605530064976237 | Southeast Bank Capital Services Ltd |                                                                                                     |
| 30      | JAVEED A MATIN               | S11295      | 1605530069025711 | Southeast Bank Capital Services Ltd |                                                                                                     |





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**Individual Trade Patterns, Trade monitoring screenshots, Effects of "SONALIPAPR" at DSE in public market by the said clients and gain and loss statement are given below:**

**a) Individual Trade Patterns of Mr. Md. Abul Khayer and his associates (Only Public Market):**

| Date                | Code # S11118                       |        |          |        | Code # 1689                  |        |          |      | Code # 7647                 |        |          |        | Code # ABM645                      |      |          |        | Code # Y01550                       |        |          |      | Code # ABM663                      |        |          |        |
|---------------------|-------------------------------------|--------|----------|--------|------------------------------|--------|----------|------|-----------------------------|--------|----------|--------|------------------------------------|------|----------|--------|-------------------------------------|--------|----------|------|------------------------------------|--------|----------|--------|
|                     | BO ID # 1605530052137148            |        |          |        | BO ID # 1205950071091116     |        |          |      | BO ID # 1205590071091116    |        |          |        | BO ID # 1605110071091116           |      |          |        | BO ID # 1206080071091116            |        |          |      | BO ID # 1605110073447222           |        |          |        |
|                     | MD. ABUL KHAYER                     |        |          |        | MD. ABUL KHAYER              |        |          |      | MD. ABUL KHAYER             |        |          |        | MD. ABUL KHAYER                    |      |          |        | MD. ABUL KHAYER                     |        |          |      | ABUL KALAM MATBER                  |        |          |        |
|                     | Southeast Bank Capital Services Ltd |        |          |        | NRBC Bank Securities Limited |        |          |      | UCB Stock Brokerage Limited |        |          |        | Agrani Equity & Investment Limited |      |          |        | Vertex Stock and Securities Limited |        |          |      | Agrani Equity & 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 | Buy Qty                            | Rate   | Sale Qty | Rate   |
| Drag from this cell | 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   |
| 01-12-2021          | 28000                               | 584.30 | 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   |
| 02-12-2021          | 0                                   | 0.00   | 0        | 0.00   | 60000                        | 628.92 | 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   |
| 05-12-2021          | 0                                   | 0.00   | 0        | 0.00   | 0                            | 0.00   | 0        | 0.00 | 0                           | 0.00   | 0        | 0.00   | 0                                  | 0.00 | 11176    | 659.79 | 0                                   | 0.00   | 0        | 0.00 | 0                                  | 0.00   | 0        | 0.00   |
| 06-12-2021          | 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 | 0                                  | 0.00   | 0        | 0.00   |
| 08-12-2021          | 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 | 0                                  | 0.00   | 146000   | 667.03 |
| 09-12-2021          | 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 | 3923                               | 643.18 | 0        | 0.00   |
| 12-12-2021          | 0                                   | 0.00   | 0        | 0.00   | 0                            | 0.00   | 0        | 0.00 | 0                           | 0.00   | 0        | 0.00   | 0                                  | 0.00 | 0        | 0.00   | 8376                                | 641.78 | 0        | 0.00 | 0                                  | 0.00   | 0        | 0.00   |
| 13-12-2021          | 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 | 93000                              | 688.56 | 0        | 0.00   |
| 14-12-2021          | 0                                   | 0.00   | 0        | 0.00   | 0                            | 0.00   | 0        | 0.00 | 0                           | 0.00   | 0        | 0.00   | 0                                  | 0.00 | 41642    | 711.61 | 0                                   | 0.00   | 0        | 0.00 | 0                                  | 0.00   | 0        | 0.00   |
| 15-12-2021          | 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 | 0                                  | 0.00   | 0        | 0.00   |
| 19-12-2021          | 0                                   | 0.00   | 0        | 0.00   | 0                            | 0.00   | 0        | 0.00 | 0                           | 0.00   | 0        | 0.00   | 0                                  | 0.00 | 558      | 768.46 | 0                                   | 0.00   | 0        | 0.00 | 98025                              | 770.25 | 0        | 0.00   |
| 20-12-2021          | 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 | 10000                              | 825.67 | 0        | 0.00   |
| 22-12-2021          | 53900                               | 841.52 | 65000    | 843.80 | 0                            | 0.00   | 0        | 0.00 | 0                           | 0.00   | 0        | 0.00   | 0                                  | 0.00 | 0        | 0.00   | 470                                 | 845.80 | 0        | 0.00 | 0                                  | 0.00   | 0        | 0.00   |
| 23-12-2021          | 11100                               | 855.70 | 0        | 0.00   | 38000                        | 843.30 | 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   |
| 26-12-2021          | 52580                               | 870.47 | 219838   | 895.00 | 0                            | 0.00   | 0        | 0.00 | 15000                       | 877.79 | 1000     | 855.16 | 0                                  | 0.00 | 0        | 0.00   | 0                                   | 0.00   | 0        | 0.00 | 0                                  | 0.00   | 0        | 0.00   |
| 27-12-2021          | 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 | 209940                             | 899.75 | 200000   | 892.00 |
| 28-12-2021          | 208079                              | 894.14 | 0        | 0.00   | 23500                        | 892.57 | 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   |
| 29-12-2021          | 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 | 0                                  | 0.00   | 0        | 0.00   |
| 30-12-2021          | 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 | 0                                  | 0.00   | 0        | 0.00   |
| Total               | 353659                              |        | 284838   |        | 121500                       |        | 0        |      | 88552                       |        | 29144    |        | 53376                              |      | 8376     |        | 470                                 |        | 0        |      | 414888                             |        | 346000   |        |

| Date                | Code # 9166                 |        |          |        | Code # 43878             |        |          |      | Code # 08003             |      |          |      | Code # 3898                 |      |          |        | Code # S2131                   |        |          |        | Code # 43685             |        |          |      |
|---------------------|-----------------------------|--------|----------|--------|--------------------------|--------|----------|------|--------------------------|------|----------|------|-----------------------------|------|----------|--------|--------------------------------|--------|----------|--------|--------------------------|--------|----------|------|
|                     | BO ID # 1205590073447222    |        |          |        | BO ID # 1201950068901021 |        |          |      | BO ID # 1204480068636491 |      |          |      | BO ID # 1205590068284973    |      |          |        | BO ID # 1604530066385504       |        |          |        | BO ID # 1201950066385504 |        |          |      |
|                     | ABUL KALAM MATBER           |        |          |        | Abul Kalam Matber        |        |          |      | ABUL KALAM MATBER        |      |          |      | KAZI SADIA HASAN            |      |          |        | Kazi Sadia Hasan               |        |          |        | Kazi Sadia Hasan         |        |          |      |
|                     | UCB Stock Brokerage Limited |        |          |        | EBL Securities Limited   |        |          |      | IIFC Securities Limited  |      |          |      | UCB Stock Brokerage Limited |      |          |        | SBL Capital Management Limited |        |          |        | EBL 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   | Buy Qty                  | Rate   | Sale Qty | Rate |
| Drag from this cell | 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 |
| 01-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 02-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 05-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 06-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 8237     | 651.31 | 0                              | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 08-12-2021          | 0                           | 0.00   | 0        | 0.00   | 9000                     | 650.60 | 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 |
| 09-12-2021          | 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   | 2500                     | 650.20 | 0        | 0.00 |
| 12-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 13-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 144041   | 688.25 | 0                              | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 14-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 15-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 8900     | 765.07 | 0                              | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 19-12-2021          | 0                           | 0.00   | 0        | 0.00   | 27061                    | 817.41 | 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 |
| 20-12-2021          | 0                           | 0.00   | 8794     | 836.46 | 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 |
| 22-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 9005     | 840.86 | 221000                         | 809.00 | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 23-12-2021          | 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   | 0                        | 0.00   | 0        | 0.00 |
| 26-12-2021          | 70000                       | 879.38 | 0        | 0.00   | 61799                    | 857.00 | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 0        | 0.00   | 50000                          | 852.58 | 0        | 0.00   | 39139                    | 854.18 | 0        | 0.00 |
| 27-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 20000    | 879.80 | 0                              | 0.00   | 32169    | 856.19 | 0                        | 0.00   | 0        | 0.00 |
| 28-12-2021          | 0                           | 0.00   | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 0        | 0.00   | 57000                          | 878.70 | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 29-12-2021          | 0                           | 0.00   | 0        | 0.00   | 8149                     | 927.77 | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 0        | 0.00   | 35286                          | 881.27 | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 |
| 30-12-2021          | 10000                       | 957.70 | 0        | 0.00   | 0                        | 0.00   | 0        | 0.00 | 0                        | 0.00 | 0        | 0.00 | 0                           | 0.00 | 240      | 929.29 | 6008                           | 931.69 | 0        | 0.00   | 300                      | 921.00 | 0        | 0.00 |
| Total               | 80000                       |        | 8794     |        | 106009                   |        | 0        |      | 0                        |      | 0        |      | 190183                      |      | 221240   |        | 180463                         |        | 0        |        | 41939                    |        | 0        |      |



**Bangladesh Securities and Exchange Commission**  
Enforcement Division  
Enforcement Department  
Market, Market Intermediaries and Other Affairs Section  
www.sec.gov.bd

| Date                | Code # S2142                   |        |           |      | Code # 45050             |        |           |        | Code # 45800             |        |           |      | Code # 08049             |        |           |      | Code # S11294                       |      |           |      | Code # 9177                 |      |           |        |
|---------------------|--------------------------------|--------|-----------|------|--------------------------|--------|-----------|--------|--------------------------|--------|-----------|------|--------------------------|--------|-----------|------|-------------------------------------|------|-----------|------|-----------------------------|------|-----------|--------|
|                     | BO ID # 1604530069585574       |        |           |      | BO ID # 1201950064976237 |        |           |        | BO ID # 1201950074169484 |        |           |      | BO ID # 1204480064976237 |        |           |      | BO ID # 1605530064976237            |      |           |      | BO ID # 1205590073684389    |      |           |        |
|                     | SHAKIB AL HASAN                |        |           |      | SHAKIB AL HASAN          |        |           |        | Shakib Al Hasan          |        |           |      | SHAKIB AL HASAN          |        |           |      | SHAKIB AL HASAN                     |      |           |      | KAZI FARID HASAN            |      |           |        |
|                     | SBL Capital Management Limited |        |           |      | EBL Securities Limited   |        |           |        | EBL Securities Limited   |        |           |      | IIFDC Securities Limited |        |           |      | Southeast Bank Capital Services Ltd |      |           |      | UCB Stock Brokerage 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 | Buy Qty                     | Rate | Sale Qty. | Rate   |
| Drag from this cell | 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   |
| 01-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 02-12-2021          | 0                              | 0.00   | 0         | 0.00 | 3265                     | 629.40 | 2400      | 629.30 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00   |
| 05-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 06-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 08-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 09-12-2021          | 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 | 0                           | 0.00 | 35098     | 656.90 |
| 12-12-2021          | 0                              | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   | 0                        | 0.00   | 0         | 0.00 | 1000                     | 684.02 | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00   |
| 13-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 14-12-2021          | 0                              | 0.00   | 0         | 0.00 | 0                        | 0.00   | 265       | 762.20 | 0                        | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00   |
| 15-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 19-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 20-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 22-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 23-12-2021          | 25000                          | 853.00 | 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   |
| 26-12-2021          | 93415                          | 856.26 | 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   |
| 27-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 28-12-2021          | 0                              | 0.00   | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00   | 6571                     | 897.21 | 0         | 0.00 | 0                        | 0.00   | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00   |
| 29-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| 30-12-2021          | 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 | 0                           | 0.00 | 0         | 0.00   |
| Total               | 118415                         |        | 0         |      | 3265                     |        | 2665      |        | 6571                     |        | 0         |      | 1000                     |        | 0         |      | 0                                   |      | 0         |      | 0                           |      | 35098     |        |

| Date                | Code # S11331                       |      |           |      | Code # 08013             |      |           |        | Code # S2194                   |      |           |        | Code # 10057                |        |           |      | Code # 10058                |      |           |      | Code # S11295                       |      |           |      |
|---------------------|-------------------------------------|------|-----------|------|--------------------------|------|-----------|--------|--------------------------------|------|-----------|--------|-----------------------------|--------|-----------|------|-----------------------------|------|-----------|------|-------------------------------------|------|-----------|------|
|                     | BO ID # 1605530073684359            |      |           |      | BO ID # 1204480068944961 |      |           |        | BO ID # 1604530072553290       |      |           |        | BO ID # 1205590073870641    |        |           |      | BO ID # 1205590073870821    |      |           |      | BO ID # 1605530069025711            |      |           |      |
|                     | KAZI FARID HASAN                    |      |           |      | KAZI FARID HASAN         |      |           |        | KONIKA AFROZE                  |      |           |        | SAJED MADBAR                |        |           |      | MOHAMMAD BASHAR             |      |           |      | JAVEED A MATIN                      |      |           |      |
|                     | Southeast Bank Capital Services Ltd |      |           |      | IIFDC Securities Limited |      |           |        | SBL Capital Management Limited |      |           |        | UCB Stock Brokerage Limited |        |           |      | UCB Stock Brokerage Limited |      |           |      | Southeast Bank Capital Services 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 |
| Drag from this cell | 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 |
| 01-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 02-12-2021          | 0                                   | 0.00 | 0         | 0.00 | 0                        | 0.00 | 250       | 629.40 | 0                              | 0.00 | 0         | 0.00   | 0                           | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 |
| 05-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 06-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 08-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 09-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 12-12-2021          | 0                                   | 0.00 | 0         | 0.00 | 0                        | 0.00 | 0         | 0.00   | 0                              | 0.00 | 54000     | 591.10 | 0                           | 0.00   | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 |
| 13-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 14-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 15-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 19-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 20-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 22-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 23-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 26-12-2021          | 0                                   | 0.00 | 0         | 0.00 | 0                        | 0.00 | 0         | 0.00   | 0                              | 0.00 | 0         | 0.00   | 12000                       | 875.08 | 0         | 0.00 | 0                           | 0.00 | 0         | 0.00 | 0                                   | 0.00 | 0         | 0.00 |
| 27-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 28-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 29-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| 30-12-2021          | 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 | 0                                   | 0.00 | 0         | 0.00 |
| Total               | 0                                   |      | 0         |      | 0                        |      | 250       |        | 0                              |      | 54000     |        | 12000                       |        | 0         |      | 0                           |      | 0         |      | 0                                   |      | 0         |      |



**Bangladesh Securities and Exchange Commission**  
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Enforcement Department  
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| Date                | Code # 7022                 |        |           |      | Code # 1688                  |      |           |      | Code # S2116                   |        |           |      | Code # N019                  |        |           |        | Code # ABM646                      |        |           |        | Code # 43816             |        |           |        |
|---------------------|-----------------------------|--------|-----------|------|------------------------------|------|-----------|------|--------------------------------|--------|-----------|------|------------------------------|--------|-----------|--------|------------------------------------|--------|-----------|--------|--------------------------|--------|-----------|--------|
|                     | BO ID # 1205590065757811    |        |           |      | BO ID # 1205950065757811     |      |           |      | BO ID # 1604530065757811       |        |           |      | BO ID # 1606150074345644     |        |           |        | BO ID # 1605110071212010           |        |           |        | BO ID # 1201950067588060 |        |           |        |
|                     | DIT CO-OPERATIVE LTD.       |        |           |      | DIT CO-OPERATIVE LTD.        |      |           |      | DIT CO-OPERATIVE LTD.          |        |           |      | MONARCH HOTEL & RESORTS LTD. |        |           |        | MONARCH HOLDINGS LIMITED           |        |           |        | Softavion Ltd.           |        |           |        |
|                     | UCB Stock Brokerage Limited |        |           |      | NRBC Bank Securities Limited |      |           |      | SBL Capital Management Limited |        |           |      | UCB Investment Limited       |        |           |        | Agrani Equity & Investment Limited |        |           |        | EBL 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   | Buy Qty                  | Rate   | Sale Qty. | Rate   |
| Drag from this cell | 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   |
| 01-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 02-12-2021          | 71000                       | 614.29 | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 0                              | 0.00   | 0         | 0.00 | 54742                        | 507.13 | 0         | 0.00   | 0                                  | 0.00   | 0         | 0.00   | 0                        | 0.00   | 0         | 0.00   |
| 05-12-2021          | 0                           | 0.00   | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 0                              | 0.00   | 0         | 0.00 | 24324                        | 558.73 | 0         | 0.00   | 0                                  | 0.00   | 30000     | 663.60 | 0                        | 0.00   | 0         | 0.00   |
| 06-12-2021          | 0                           | 0.00   | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 0                              | 0.00   | 0         | 0.00 | 4500                         | 559.90 | 0         | 0.00   | 0                                  | 0.00   | 0         | 0.00   | 0                        | 0.00   | 0         | 0.00   |
| 08-12-2021          | 0                           | 0.00   | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 0                              | 0.00   | 0         | 0.00 | 0                            | 0.00   | 0         | 0.00   | 9660                               | 671.55 | 103370    | 667.73 | 0                        | 0.00   | 0         | 0.00   |
| 09-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 12-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 13-12-2021          | 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   | 77329     | 691.10 | 2625                     | 691.10 | 0         | 0.00   |
| 14-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 15-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 19-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 20-12-2021          | 0                           | 0.00   | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 0                              | 0.00   | 0         | 0.00 | 0                            | 0.00   | 80000     | 781.30 | 0                                  | 0.00   | 0         | 0.00   | 1700                     | 827.20 | 0         | 0.00   |
| 22-12-2021          | 29000                       | 837.63 | 0         | 0.00 | 0                            | 0.00 | 0         | 0.00 | 8564                           | 838.53 | 0         | 0.00 | 0                            | 0.00   | 0         | 0.00   | 0                                  | 0.00   | 0         | 0.00   | 0                        | 0.00   | 8000      | 835.00 |
| 23-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 26-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 27-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 28-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 29-12-2021          | 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   | 0                        | 0.00   | 0         | 0.00   |
| 30-12-2021          | 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   | 2105                     | 926.93 | 0         | 0.00   |
| Total               | 100000                      |        | 0         |      | 0                            |      | 0         |      | 8564                           |        | 0         |      | 83566                        |        | 80000     |        | 9660                               |        | 210699    |        | 141511                   |        | 8000      |        |

| Date                | Total   |          |                |           |           |                |
|---------------------|---------|----------|----------------|-----------|-----------|----------------|
|                     | Buy Qty | Buy Rate | Total          | Sale Qty. | Sale Rate | Total          |
| Drag from this cell | 0       | -        | -              | 0         | -         | -              |
| 01-12-2021          | 28000   | 584.30   | 16,360,354.00  | 0         | -         | -              |
| 02-12-2021          | 194007  | 617.44   | 119,787,479.70 | 2650      | 629.31    | 1,667,670.00   |
| 05-12-2021          | 43737   | 657.60   | 28,761,437.30  | 30000     | 663.60    | 19,907,905.00  |
| 06-12-2021          | 4500    | 659.90   | 2,969,569.40   | 146000    | 667.03    | 97,385,674.30  |
| 08-12-2021          | 25083   | 657.47   | 16,491,261.70  | 103370    | 667.73    | 69,023,177.50  |
| 09-12-2021          | 0       | -        | -              | 43474     | 653.99    | 28,431,400.60  |
| 12-12-2021          | 240666  | 688.38   | 165,670,096.60 | 131329    | 691.10    | 90,761,471.90  |
| 13-12-2021          | 41642   | 711.61   | 29,632,733.60  | 0         | -         | -              |
| 14-12-2021          | 0       | -        | -              | 265       | 762.20    | 201,983.00     |
| 15-12-2021          | 107483  | 769.81   | 82,741,893.80  | 0         | -         | -              |
| 19-12-2021          | 38761   | 819.97   | 31,782,801.70  | 80000     | 781.30    | 62,504,000.00  |
| 20-12-2021          | 470     | 845.80   | 397,526.00     | 16794     | 835.76    | 14,035,817.10  |
| 22-12-2021          | 100469  | 840.69   | 84,402,674.00  | 286000    | 816.91    | 233,636,132.00 |
| 23-12-2021          | 163239  | 851.08   | 138,929,424.40 | 0         | -         | -              |
| 26-12-2021          | 566903  | 878.42   | 497,976,910.90 | 420838    | 893.48    | 376,010,165.10 |
| 27-12-2021          | 57000   | 878.70   | 50,085,900.00  | 0         | -         | -              |
| 28-12-2021          | 273436  | 892.42   | 244,019,187.60 | 0         | -         | -              |
| 29-12-2021          | 16562   | 928.96   | 15,385,442.00  | 240       | 929.29    | 223,030.00     |
| 30-12-2021          | 218633  | 958.90   | 209,647,521.50 | 28144     | 955.45    | 26,890,239.50  |
| Total               | 2120591 |          |                | 1289104   |           |                |

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# Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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**b) Effects of "SONALIPAPR" at DSE (both Public Market and Block Market) by Mr. Md. Abul Khayer and his associates:**

| Date            | Buy     |        |               | Sale    |        |               | 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 (%) |
|                 | 1       | 2      | 3             | 4       | 5      | 6             | 8                   | 9             | 10             | 11             | 12            | 13                         | 14                     | 15                      | 16             | 17              | 18               |
| Opening Balance |         |        |               |         |        |               |                     |               | 1609594.8      | 564.75         | 909021141.12  |                            |                        |                         |                |                 |                  |
| 01-12-2021      | 238000  | 569.33 | 135500354.00  | 4000    | 580.00 | 2320000.00    | 565.34              | 2261364.87    | 1843594.8      | 565.34         | 1042260130.25 | 461140                     | 585.50                 | 0.00%                   | 51.61%         | 0.87%           | 52.48%           |
| 02-12-2021      | 194007  | 617.44 | 119787479.70  | 2650    | 629.31 | 1667670.00    | 570.30              | 1511299.30    | 2034951.8      | 570.30         | 1160536310.65 | 527501                     | 629.30                 | 7.48%                   | 36.78%         | 0.50%           | 37.28%           |
| 05-12-2021      | 43737   | 657.60 | 28761437.30   | 30000   | 663.60 | 19907905.00   | 572.14              | 17164152.92   | 2048688.8      | 572.14         | 1172133595.03 | 297097                     | 657.90                 | 4.54%                   | 14.72%         | 10.10%          | 24.82%           |
| 06-12-2021      | 4500    | 659.90 | 2969569.40    | 246000  | 643.74 | 158350674.30  | 572.33              | 140793373.92  | 1807188.8      | 572.33         | 1034309790.51 | 488139                     | 653.30                 | -0.70%                  | 0.92%          | 50.40%          | 51.32%           |
| 08-12-2021      | 25083   | 657.47 | 16491261.70   | 103370  | 667.73 | 69023177.50   | 573.50              | 59282309.95   | 1728901.8      | 573.50         | 991518742.25  | 381987                     | 652.60                 | 2.10%                   | 6.57%          | 27.06%          | 33.63%           |
| 09-12-2021      | 0       | 0.00   | 0.00          | 51474   | 647.17 | 33312200.60   | 573.50              | 29520147.26   | 1677427.8      | 573.50         | 961998594.99  | 168502                     | 642.90                 | -1.49%                  | 0.00%          | 30.55%          | 30.55%           |
| 12-12-2021      | 240666  | 688.38 | 165670096.60  | 135329  | 690.48 | 93441471.90   | 587.91              | 79561425.18   | 1782764.8      | 587.91         | 1048107266.41 | 591166                     | 691.10                 | 7.50%                   | 40.71%         | 22.89%          | 63.60%           |
| 13-12-2021      | 41642   | 711.61 | 29632733.60   | 60000   | 650.00 | 39000000.00   | 590.73              | 35444068.72   | 1764406.8      | 590.73         | 1042295931.28 | 288477                     | 723.90                 | 4.75%                   | 14.44%         | 20.80%          | 35.23%           |
| 14-12-2021      | 0       | 0.00   | 0.00          | 24965   | 698.34 | 17433983.00   | 590.73              | 14747686.26   | 1739441.8      | 590.73         | 1027548245.02 | 337585                     | 762.90                 | 5.39%                   | 0.00%          | 7.40%           | 7.40%            |
| 15-12-2021      | 107483  | 769.81 | 82741893.80   | 5500    | 720.00 | 3960000.00    | 601.16              | 3306358.64    | 1841424.8      | 601.16         | 1106983780.19 | 342348                     | 769.50                 | 0.87%                   | 31.40%         | 1.61%           | 33.00%           |
| 19-12-2021      | 38761   | 819.97 | 31782801.70   | 80000   | 781.30 | 62504000.00   | 605.67              | 48453363.79   | 1800185.8      | 605.67         | 1090313218.10 | 306669                     | 827.20                 | 7.50%                   | 12.64%         | 26.09%          | 38.73%           |
| 20-12-2021      | 470     | 845.80 | 397526.00     | 169794  | 803.54 | 136435817.10  | 605.73              | 102849273.07  | 1630861.8      | 605.73         | 987861471.03  | 335078                     | 832.90                 | 0.69%                   | 0.14%          | 50.57%          | 50.81%           |
| 22-12-2021      | 100469  | 840.09 | 84402674.00   | 413000  | 811.71 | 335236132.00  | 619.33              | 255783061.16  | 1318330.8      | 619.33         | 816481083.87  | 678663                     | 840.70                 | 6.24%                   | 14.80%         | 60.85%          | 75.66%           |
| 23-12-2021      | 163239  | 851.08 | 138929424.40  | 0       | 0.00   | 0.00          | 0.00                | 0.00          | 1481569.8      | 644.86         | 955410508.27  | 261368                     | 853.50                 | 1.52%                   | 62.46%         | 0.00%           | 62.46%           |
| 26-12-2021      | 566903  | 878.42 | 497976910.90  | 420838  | 893.48 | 376010165.10  | 709.50              | 298583732.58  | 1627634.8      | 709.50         | 1154803686.59 | 1735021                    | 855.30                 | 0.21%                   | 32.67%         | 24.26%          | 56.93%           |
| 27-12-2021      | 57000   | 878.70 | 50085900.00   | 0       | 0.00   | 0.00          | 0.00                | 0.00          | 1684634.8      | 715.22         | 1204889586.59 | 170653                     | 868.60                 | 1.56%                   | 33.40%         | 0.00%           | 33.40%           |
| 28-12-2021      | 273436  | 892.42 | 244019187.60  | 77000   | 850.00 | 65450000.00   | 739.97              | 56977498.27   | 1881070.8      | 739.97         | 1391931275.93 | 564236                     | 889.70                 | 2.43%                   | 48.46%         | 13.55%          | 62.11%           |
| 29-12-2021      | 16562   | 928.96 | 15385442.00   | 15240   | 880.78 | 13423030.00   | 741.62              | 11302242.87   | 1882392.8      | 741.62         | 1396014475.06 | 201012                     | 927.40                 | 4.24%                   | 8.24%          | 7.58%           | 15.82%           |
| 30-12-2021      | 369633  | 971.61 | 359137521.50  | 28144   | 955.45 | 26890239.50   | 779.37              | 21934472.42   | 2223881.8      | 779.37         | 1733217524.14 | 1327785                    | 957.70                 | 3.27%                   | 27.84%         | 2.12%           | 29.96%           |
| Total           | 2481591 | 807.41 | 2003672214.20 | 1867304 | 778.86 | 1454376466.00 | 631.65              | 1179475831.18 | 2223881.8      | 779.37         | 1733217524.14 |                            |                        |                         |                |                 |                  |

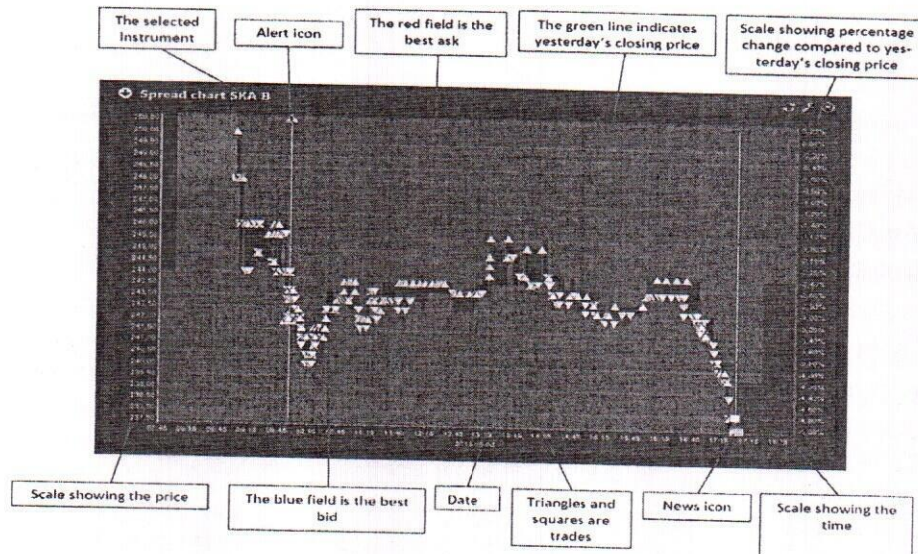
**c) Trade monitoring screenshots of Mr. Md. Abul Khayer and his associates (public market):**

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

The details of the graphs are given below:



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▲ Green triangle represents trade of 'SONALIPAPR' by Mr. Md. Abul Khayer and his associates

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

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

**BOIDs:** 1205950071091116, 1205590071091116, 1605110071091116, 1206080071091116, 1202600071091116, 1205870071091116, 1605110073447222, 1205590073447222, 1201950068001021, 1204480068636491, 1605530052137148, 1205590068284973, 1604530066385504, 1201950066385504, 1205590073684359, 1605530073684359, 1204480068944961, 1205590065757811, 1205950065757811, 1604530065757811, 1606150074345644, 1605110071212010, 1204780071859768, 1605180073786062, 1604530072553290, 1205590073870641, 1205590073870821, 1201950067588060, 1604530069585574, 1201950064976237, 1201950074169484, 1204480064976237, 1605530064976237 and 1605530069025711 (combined):

❖ It was observed in the graph that on 01-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 466, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 140 which is approximately 30.0% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 120,276 whereas, buy volume by the said client was 28,000 which is approximately 23.3% of the total volume in the market. It is evident that the client had significant participation in the market on 01-12-2021 in trading of shares of 'SONALIPAPR'.

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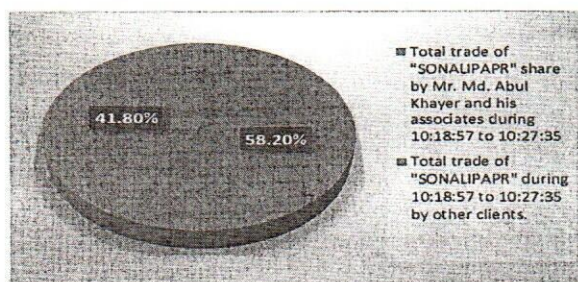
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On 01-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 570.00 which is Tk. 25.30 more than the YCP of Tk. 544.70. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:18:57 at price Tk. 577.00 and induced the same to rise to Tk. 585.50 up to 10:27:35. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:18:57 to 10:27:35, Mr. Md. Abul Khayer and his associates bought 28,000 shares of "SONALIPAPR" compared to the total traded share of 48,109. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 140 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 277.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 58.20% of the total trades of shares of "SONALIPAPR" by executing 140 of total 277 howlas from 10:18:57 to 10:27:35 on 01-12-2021. From 10:18:57 to 10:27:35, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 577.00 to Tk. 585.50. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 40.80 which is approximately 7.49% higher than YCP.

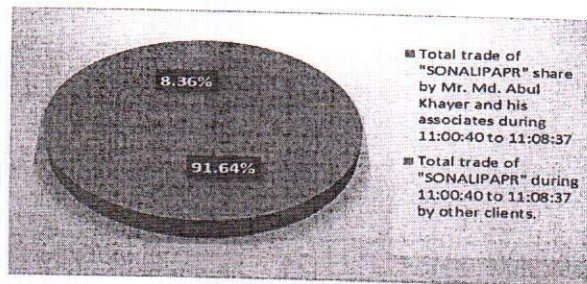
- ❖ It was observed in the graph dated 02-12-2021 that, total number of trades of shares of 'SONALIPAPR' in the market was 1,768 whereas, number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 173 which is approximately 9.8% of the total number of trades in the market. Again, total volume of 'SONALIPAPR' in the market on that day was 518,601 whereas, buy volume by the said client was 194,007 which is approximately 37.4% of the total volume in the market.

On 02-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 588.00 which is Tk. 2.50 more than the YCP of Tk. 585.50. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 11:00:40 at price Tk. 624.90 and induced the same to rise to Tk. 629.40 up to 11:08:37. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 11:00:40 to 11:08:37, Mr. Md. Abul Khayer and his associates bought 60,000 shares of "SONALIPAPR" compared to the total traded share of 65,475. This is shown in the following Pie Chart:

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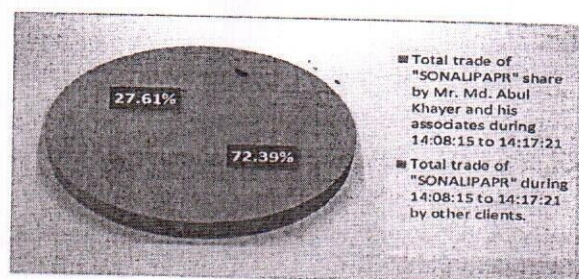


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 130 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 180.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 91.64% of the total trades of shares of "SONALIPAPR" by executing 130 of total 180 howlas from 11:00:40 to 11:08:37 on 02-12-2021. From 11:00:40 to 11:08:37, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 624.90 to Tk. 629.40. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 43.80 which is approximately 7.48% higher than YCP.

❖ It was observed in the graph that on 05-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 1,739 whereas, number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 156 which is approximately 9.0% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 294,897 whereas, buy volume by the said client was 43,737 which is approximately 14.8% of the total volume in the market.

On 05-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 630.10 which is Tk. 0.80 more than the YCP of Tk. 629.30. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 14:08:15 at price Tk. 647.00 and induced the same to rise to Tk. 665.00 up to 14:17:21. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:08:15 to 14:17:21, Mr. Md. Abul Khayer and his associates bought 24,237 shares of "SONALIPAPR" compared to the total traded share of 33,479. This is shown in the following Pie Chart:



*(Signature)*



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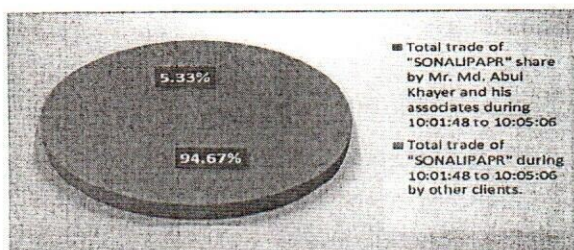
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It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 111 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 166.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 72.39% of the total trades of shares of "SONALIPAPR" by executing 111 of total 166 howlas from 14:08:15 to 14:17:21 on 05-12-2021. From 14:08:15 to 14:17:21, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 647.00 to Tk. 665.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 28.60 which is approximately 4.54% higher than YCP.

- ❖ It was observed in the graph that on 12-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2,262, whereas, number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 824 which is approximately 36.4% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 584,161, whereas, buy volume by the said client was 240,666 which is approximately 41.2% of the total volume in the market. It is evident that the client had significant participation in the market on 12-12-2021 in trading of shares of 'SONALIPAPR'.

On 12-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 664.10 which is Tk. 21.20 more than the YCP of Tk. 642.90. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:01:48 at price Tk. 671.00 and induced the same to rise to Tk. 691.10 up to 10:05:06. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:01:48 to 10:05:06, Mr. Md. Abul Khayer and his associates bought 76,712 shares of "SONALIPAPR" compared to the total traded share of 81,031.



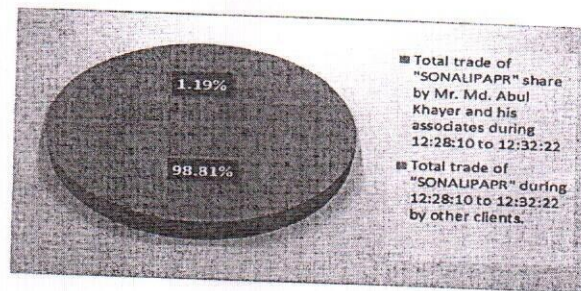
It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 178 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 203.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 94.67% of the total trades of shares of "SONALIPAPR" by executing 178 of total 203 howlas from 10:01:48 to 10:05:06 on 12-12-2021. From 10:01:48 to 10:05:06, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 671.00 to Tk. 691.10. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".



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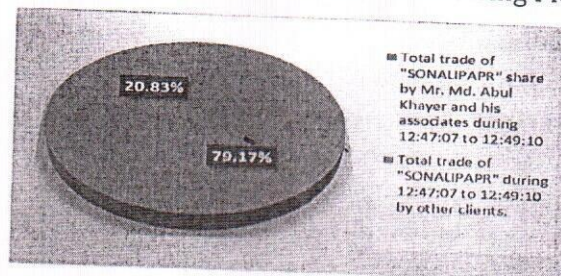
Again, on 12-12-2021, Mr. Md. Abul Khayer and his associates started series of trading at 12:28:10 at price Tk. 667.10 for the second time and induced the same to rise to Tk. 691.10 up to 12:32:22. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 12:28:10 to 12:32:22, Mr. Md. Abul Khayer and his associates bought 113,590 shares of "SONALIPAPR" compared to the total traded share of 114,956. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 434 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 448.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 98.81% of the total trades of shares of "SONALIPAPR" by executing 434 of total 448 howlas from 12:28:10 to 12:32:22 on 12-12-2021. From 12:28:10 to 12:32:22, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 667.10 to Tk. 691.10. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".

Finally, Mr. Md. Abul Khayer and his associates started series of trading at 12:47:07 at price Tk. 685.00 and induced the same to rise to Tk. 691.10 up to 12:49:10. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 12:47:07 to 12:49:10, Mr. Md. Abul Khayer and his associates bought 30,451 shares of "SONALIPAPR" compared to the total traded share of 38,461. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 130 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 149.



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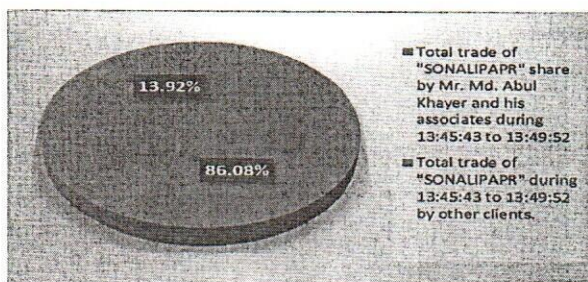
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It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 79.17% of the total trades of shares of "SONALIPAPR" by executing 130 of total 149 howlas from 12:47:07 to 12:49:10 on 12-12-2021. From 12:47:07 to 12:49:10, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 685.00 to Tk. 691.10. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 48.20 which is approximately 7.50% higher than YCP.

- ❖ It was observed in the graph that on 13-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 1,988, whereas, number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 317 which is approximately 15.9% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 181,577, whereas, buy volume by the said client alone was 41,642 which is approximately 22.9% of the total volume in the market. It is evident that the client had significant participation in the market on 13-12-2021 in trading of shares of 'SONALIPAPR'.

On 13-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 699.00 which is Tk. 7.90 more than the YCP of Tk. 691.10. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 13:45:43 at price Tk. 694.60 and induced the same to rise to Tk. 715.00 up to 13:49:52. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 13:45:43 to 13:49:52, Mr. Md. Abul Khayer and his associates bought 28,652 shares of "SONALIPAPR" compared to the total traded share of 33,286. This is shown in the following Pie Chart:



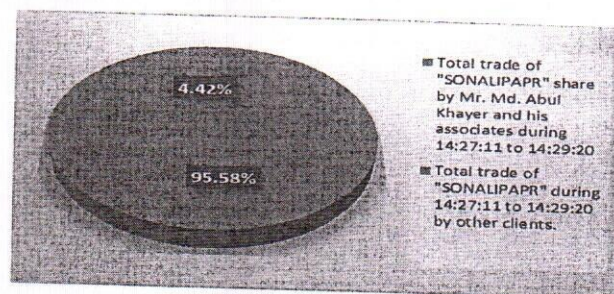
It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 225 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 299.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 86.08% of the total trades of shares of "SONALIPAPR" by executing 225 of total 299 howlas from 13:45:43 to 13:49:52 on 13-12-2021. From 13:45:43 to 13:49:52, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 694.60 to Tk. 715.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".



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Again on 13-12-2021, Mr. Md. Abul Khayer and his associates started series of trading for the second time at 14:27:11 at price Tk. 712.60 for the second time and induced the same to rise to Tk. 734.00 up to 14:29:20. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:27:11 to 14:29:20, Mr. Md. Abul Khayer and his associates bought 7,526 shares of "SONALIPAPR" compared to the total traded share of 7,874. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 50 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 60.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 95.58% of the total trades of shares of "SONALIPAPR" by executing 50 of total 60 howlas from 14:27:11 to 14:29:20 on 13-12-2021. From 14:27:11 to 14:29:20, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 712.60 to Tk. 734.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 32.80 which is approximately 4.75% higher than YCP.

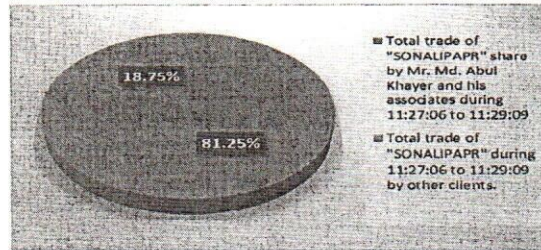
- ❖ It was observed in the graph that on 15-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2,260, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 291 which is approximately 12.9% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 335,148, whereas, buy volume by the said client alone was 107,483 which is approximately 32.1% of the total volume in the market. It is evident that the client had significant participation in the market on 15-12-2021 in trading of shares of 'SONALIPAPR'.

On 15-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 759.90 which is Tk. 3.00 less than the YCP of Tk. 762.90. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 11:27:06 at price Tk. 755.00 and induced the same to rise to Tk. 779.00 up to 11:29:09. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 11:27:06 to 11:29:09, Mr. Md. Abul Khayer and his associates bought 51,927 shares of "SONALIPAPR" compared to the total traded share of 63,909. This is shown in the following Pie Chart:

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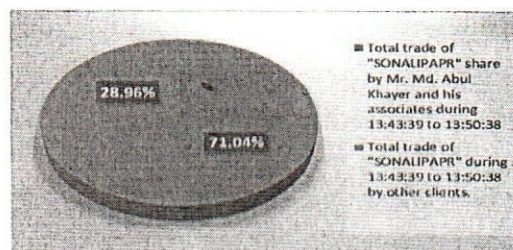


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 116 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 188.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 81.25% of the total trades of shares of "SONALIPAPR" by executing 116 of total 188 howlas from 11:27:06 to 11:29:09 on 15-12-2021. From 11:27:06 to 11:29:09, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 755.00 to Tk. 779.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 6.60 which is approximately 0.87% higher than YCP.

- ❖ It was observed in the graph that on 19-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2039, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 205 which is approximately 10.1% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 306,019, whereas, buy volume by the said client alone was 38,761 which is approximately 12.7% of the total volume in the market.

On 19-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 775.00 which is Tk. 5.50 more than the YCP of Tk. 769.50. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 13:43:39 at price Tk. 802.20 and induced the same to rise to Tk. 827.00 up to 13:50:38. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 13:43:39 to 13:50:38, Mr. Md. Abul Khayer and his associates bought 29,396 shares of "SONALIPAPR" compared to the total traded share of 41,379. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 133 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 206.

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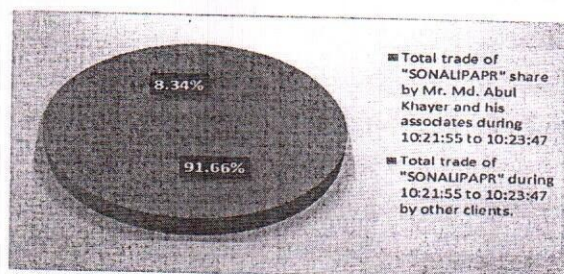
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It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 71.04% of the total trades of shares of "SONALIPAPR" by executing 133 of total 206 howlas from 13:43:39 to 13:50:38 on 19-12-2021. From 13:43:39 to 13:50:38, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 802.20 to Tk. 827.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 57.70 which is approximately 7.50% higher than YCP.

❖ It was observed in the graph that on 22-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2,442, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 683 which is approximately 28.0% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 526,103, whereas, buy volume by the said client alone was 100,469 which is approximately 19.1% of the total volume in the market.

On 22-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 796.90 which is Tk. 5.60 more than the YCP of Tk. 791.30. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:21:55 at price Tk. 811.90 and induced the same to rise to Tk. 850.00 up to 10:23:47. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:21:55 to 10:23:47, Mr. Md. Abul Khayer and his associates bought 27,521 shares of "SONALIPAPR" compared to the total traded share of 30,026. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 169 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 189.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 91.66% of the total trades of shares of "SONALIPAPR" by executing 169 of total 189 howlas from 10:21:55 to 10:23:47 on 22-12-2021. From 10:21:55 to 10:23:47, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 811.90 to Tk. 850.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".



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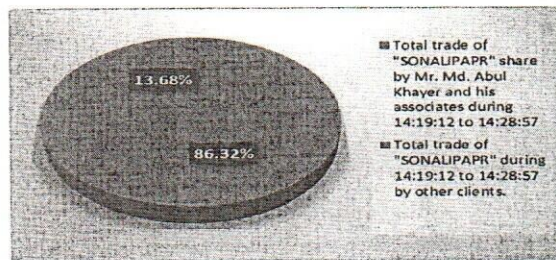
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Again on 22-12-2021, Mr. Md. Abul Khayer and his associates started their series of trading for the second time at 14:19:12 at price Tk. 829.10 for the second time and induced the same to rise to Tk. 850.00 up to 14:28:57. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:19:12 to 14:28:57, Mr. Md. Abul Khayer and his associates bought 34,464 shares of "SONALIPAPR" compared to the total traded share of 39,925. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 183 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 228.

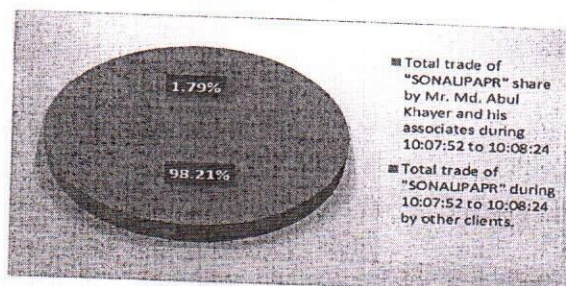
It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 86.32% of the total trades of shares of "SONALIPAPR" by executing 183 of total 228 howlas from 14:19:12 to 14:28:57 on 22-12-2021. From 14:19:12 to 14:28:57, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 829.10 to Tk. 850.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 49.40 which is approximately 6.24% higher than YCP.

- ❖ It was observed in the graph that on 23-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2,006, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 750 which is approximately 37.4% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 261,368, whereas, buy volume by the said client alone was 163,239 which is approximately 62.5% of the total volume in the market. It is evident that the client had significant participation in the market on 23-12-2021 in trading of shares of 'SONALIPAPR'.

On 23-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 852.60 which is Tk. 11.90 more than the YCP of Tk. 840.70. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:07:52 at price Tk. 847.50 and induced the same to rise to Tk. 858.90 up to 10:08:24. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:07:52 to 10:08:24, Mr. Md. Abul Khayer and his associates bought 11,000 shares of "SONALIPAPR" compared to the total traded share of 11,200. This is shown in the following Pie Chart:



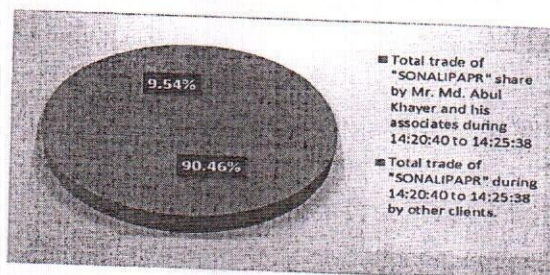
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It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 76 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 79.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 98.21% of the total trades of shares of "SONALIPAPR" by executing 76 of total 79 howlas from 10:07:52 to 10:08:24 on 23-12-2021. From 10:07:52 to 10:08:24, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 847.50 to Tk. 858.90. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".

Again on 23-12-2021, Mr. Md. Abul Khayer and his associates started series of trading at 14:20:40 at price Tk. 850.00 for the second time and induced the same to rise to Tk. 869.80 up to 14:25:38. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:20:40 to 14:25:38, Mr. Md. Abul Khayer and his associates bought 18,253 shares of "SONALIPAPR" compared to the total traded share of 20,177. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 152 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 173.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 90.46% of the total trades of shares of "SONALIPAPR" by executing 152 of total 173 howlas from 14:20:40 to 14:25:38 on 23-12-2021. From 14:20:40 to 14:25:38, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 850.00 to Tk. 869.80. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 12.80 which is approximately 1.52% higher than YCP.

*CA*



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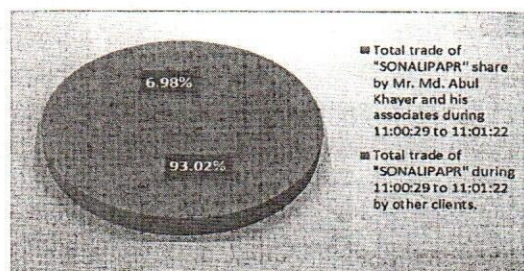
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❖ It was observed in the graph that on 26-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 2,548, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 472 which is approximately 18.5% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 1,734,141, whereas, buy volume by the said client alone was 566,903 which is approximately 32.7% of the total volume in the market. It is evident that the client had significant participation in the market on 26-09-2021 in trading of shares of 'SONALIPAPR'.

On 26-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 865.00 which is Tk. 11.50 more than the YCP of Tk. 853.50. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 11:00:29 at price Tk. 883.90 and induced the same to rise to Tk. 900.00 up to 11:01:22. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 11:00:29 to 11:01:22, Mr. Md. Abul Khayer and his associates bought 20,000 shares of "SONALIPAPR" compared to the total traded share of 21,500. This is shown in the following Pie Chart:



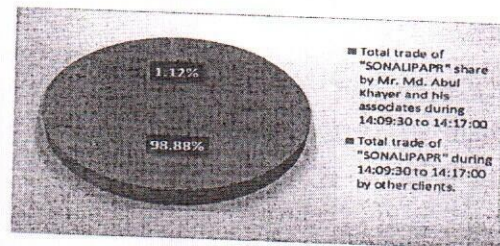
It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 141 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 158.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 93.02% of the total trades of shares of "SONALIPAPR" by executing 141 of total 158 howlas from 11:00:29 to 11:01:22 on 26-12-2021. From 11:00:29 to 11:01:22, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 883.90 to Tk. 900.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR".

Again on that day, Mr. Md. Abul Khayer and his associates started series of trading at 14:09:30 at price Tk. 845.00 for the second time and induced the same to rise to Tk. 858.00 up to 14:17:00. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:09:30 to 14:17:00, Mr. Md. Abul Khayer and his associates bought 122,679 shares of "SONALIPAPR" compared to the total traded share of 124,071. This is shown in the following Pie Chart:



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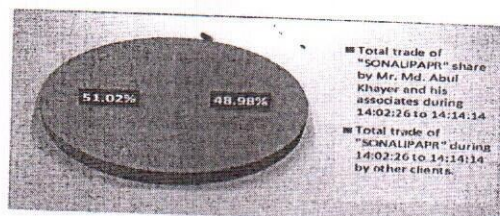


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 103 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 116.

It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 98.88% of the total trades of shares of "SONALIPAPR" by executing 103 of total 116 howlas from 14:09:30 to 14:17:00 on 26-12-2021. From 14:09:30 to 14:17:00, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 845.00 to Tk. 858.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 1.80 which is approximately 0.21% higher than YCP.

- ❖ It was observed in the graph that on 28-12-2021, total number of trades of shares of 'SONALIPAPR' in the market was 1,961, whereas number of trades (buy) executed by Mr. Md. Abul Khayer and their associates were 327 which is approximately 16.7% of the total number of trades in the market. Again, total volume of shares of 'SONALIPAPR' in the market on that day was 486,636, whereas, buy volume by the said client alone was 273,436 which is approximately 56.2% of the total volume in the market. It is evident that the client had significant participation in the market on 26-09-2021 in trading of shares of 'SONALIPAPR'.

On 28-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 877.90 which is Tk. 9.30 more than the YCP of Tk. 868.60. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 14:02:26 at price Tk. 885.00 and induced the same to rise to Tk. 900.00 up to 14:14:14. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:02:26 to 14:14:14, Mr. Md. Abul Khayer and his associates bought 34,000 shares of "SONALIPAPR" compared to the total traded share of 69,422. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 99 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 296.

*(Signature)*



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It is observed from the graphs and screenshot that Mr. Md. Abul Khayer and his associates bought 48.98% of the total trades of shares of "SONALIPAPR" by executing 99 of total 296 howlas from 14:02:26 to 14:14:14 on 28-12-2021. From 14:02:26 to 14:14:14, Mr. Md. Abul Khayer and his associates induced the price to rise from Tk. 885.00 to Tk. 900.00. Thus it seems that Mr. Md. Abul Khayer and his associates were actively trying to lift the price of shares of "SONALIPAPR". At the end of the day price of shares of "SONALIPAPR" was increased by Tk. 21.10 which is approximately 2.43% higher than YCP.

| 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        |
| 361000    | 744.13 | 268630000.00 | 578200     | 750.08 | 433697800.00 | 2481591   | 807.41 | 2003672214.20 | 1867304    | 778.86 | 1454376466.00 | 631.65              | 1179475831.18 | 2223882        | 779.37 | 1733217524.14 |

## d) Gain and Loss by Mr. Md. Abul Khayer and his associates from 01.12.2021 to 30.12.2021:

|                                     |                 |                                                                            |
|-------------------------------------|-----------------|----------------------------------------------------------------------------|
| Realized Capital gain(loss)per unit | 147.22          | Average Sale Price - Average Cost Price                                    |
| Realized Capital gain(loss)%        | 23.31%          | Gain (loss) Per Unit/Cost Per Unit                                         |
| Realized Capital gain(loss)TK       | 27,49,00,634.82 | Total Sale Quantity x Gain (loss) Per Unit                                 |
| Closing Price (30-12-2021)          | 957.70          | Closing Price of Last Investigation Date                                   |
| Unrealized gain(loss) per unit      | 178.33          | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) %             | 22.88%          | Unrealized gain (loss) per unit /Average Price of Stock Position           |
| Unrealized gain(loss) TK            | 39,65,94,075.72 | Quantity of Stock Positon x Unrealized gain (loss) per unit                |

As per DSE trade data, it was observed that Mr. Md. Abul Khayer and his associates bought 2,481,591 shares and sold 1,867,304 shares of "SONALIPAPR" from both public and block market during the period from 01.12.2021 to 30.12.2021. With their 30 (Thirty) BO accounts, Mr. Md. Abul Khayer and his associates jointly traded 44.56% shares of "SONALIPAPR" during the investigation period and realized a capital gain of Tk. 274,900,634.82 from the trading of shares of "SONALIPAPR" during the investigation period. It is also mentionable that they had significant amount of unrealized gain of Tk. 396,594,075.72.

## Finding(s)-1:

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

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



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

It is evident that Mr. Md. Abul Khayer and his associates were involved directly and indirectly in a series of transactions of shares of 'SONALIPAPR' with their aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

**Contravention(s)-1:**

Mr. Md. Abul Khayer (BOID # 1605530052137148) and his associates have violated the following:

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

**Observations - 2:**

After analyzing ledger, instrument ledger and portfolio statements of Mr. Md. Abul Khayer (BOID # 1605530052137148) and his associates, collected from DSE TREC Holder companies, it was observed that they had collectively acquired more than 10% shares of "SONALIPAPR" as on 30.12.2021. Details are given below:

| Sl. No.                                                        | Name of the account          | BO ID            | Client Code | Share balance of SONALIPAPR hold by Mr. Md. Abul Khayer and his associates |             |
|----------------------------------------------------------------|------------------------------|------------------|-------------|----------------------------------------------------------------------------|-------------|
|                                                                |                              |                  |             | 30-12-21                                                                   |             |
|                                                                |                              |                  |             | Total                                                                      | Percent (%) |
| 1                                                              | MD. ABUL KHAYER              | 1605530052137148 | S11118      | 304,451                                                                    | 1.3862      |
| 2                                                              | MD. ABUL KHAYER              | 1205950071091116 | 1689        | 241,500                                                                    | 1.0995      |
| 3                                                              | MD. ABUL KHAYER              | 1205590071091116 | 7647        | 190,221                                                                    | 0.8661      |
| 4                                                              | MD. ABUL KHAYER              | 1605110071091116 | ABM645      | 45,000                                                                     | 0.2049      |
| 5                                                              | MD. ABUL KHAYER              | 1206080071091116 | VO1550      | 470                                                                        | 0.0021      |
| 6                                                              | ABUL KALAM MATBER            | 1605110073447222 | ABM663      | 209,940                                                                    | 0.9559      |
| 7                                                              | ABUL KALAM MATBER            | 1205590073447222 | 9166        | 161,970                                                                    | 0.7375      |
| 8                                                              | Abul Kalam Matber            | 1201950068001021 | 43878       | 106,009                                                                    | 0.4827      |
| 9                                                              | ABUL KALAM MATBER            | 1204480068636491 | 08003       | 19,400                                                                     | 0.0883      |
| 10                                                             | KAZI SADIA HASAN             | 1205590068284973 | 3898        | 29,697                                                                     | 0.1352      |
| 11                                                             | Kazi Sadia Hasan             | 1604530066385504 | S2131       | 203,561                                                                    | 0.9268      |
| 12                                                             | SAJED MADBAR                 | 1201950066385504 | 43685       | 66,106                                                                     | 0.3010      |
| 13                                                             | MOHAMMAD BASHER              | 1205590073870641 | 10057       | 131,918                                                                    | 0.6006      |
| 14                                                             | KONIKA AFROZE                | 1205590073870821 | 10058       | 37,000                                                                     | 0.1685      |
| 15                                                             | KAZI FARID HASAN             | 1604530072553290 | S2194       | 910                                                                        | 0.0041      |
| 16                                                             | KAZI FARID HASAN             | 1205590073684359 | 9177        | 0                                                                          | 0.0000      |
| 17                                                             | KAZI FARID HASAN             | 1605530073684359 | S11331      | 30,288                                                                     | 0.1379      |
| 18                                                             | KAZI FARID HASAN             | 1204480068944961 | 08013       | 0                                                                          | 0.0000      |
| 19                                                             | D I T CO-OPERATIVE LTD.      | 1205590065757811 | 7022        | 133,000                                                                    | 0.6056      |
| 20                                                             | D I T CO-OPERATIVE LTD.      | 1205590065757811 | 1688        | 11,040                                                                     | 0.0503      |
| 21                                                             | D I T CO-OPERATIVE LTD.      | 1604530065757811 | S2116       | 8,564                                                                      | 0.0390      |
| 22                                                             | MONARCH HOTEL & RESORTS LTD. | 1606150074345644 | N019        | 6,166                                                                      | 0.0281      |
| 23                                                             | MONARCH HOLDINGS LIMITED     | 1605110071212010 | ABM646      | 0                                                                          | 0.0000      |
| 24                                                             | Softavlon Ltd.               | 1201950067588060 | 43816       | 157,661                                                                    | 0.7178      |
| 25                                                             | SHAKIB AL HASAN              | 1604530069585574 | S2142       | 120,176                                                                    | 0.5472      |
| 26                                                             | SHAKIB AL HASAN              | 1201950064976237 | 45050       | 3,731                                                                      | 0.0170      |
| 27                                                             | SHAKIB AL HASAN              | 1201950074169484 | 45800       | 6,571                                                                      | 0.0299      |
| 28                                                             | SHAKIB AL HASAN              | 1204480064976237 | 08049       | 1000                                                                       | 0.0046      |
| 29                                                             | SHAKIB AL HASAN              | 1605530064976237 | S11294      | 766                                                                        | 0.0035      |
| 30                                                             | JAVEED A MATIN               | 1605530069025711 | S11295      | 900                                                                        | 0.0041      |
| Total holdings                                                 |                              |                  |             | 2,228,016                                                                  | 10.14       |
| No. of outstanding securities of 'SONALIPAPR' as on 30.12.2021 |                              |                  |             | 21,963,460                                                                 |             |



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**Findings -2:**

However, as per উপ-বিধি (১)(ক) of বিধি ২ of the 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.....”

And as per বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮:

“ ----৪। 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 কোম্পানিটি যে এক্সচেঞ্জে তালিকাভুক্ত সেই এক্সচেঞ্জে সংশ্লিষ্ট অধিগ্রহণকারীর স্টক ব্রোকার বা মার্চেন্ট ব্যাংকারের মাধ্যমে দাখিল করিতে হইবে। ..... ”

**Mr. Md. Abul Khayer and his associates** have collectively bought more than 10% shares of “SONALIPAPR” as on 30.12.2021.

**Contravention-2:**

**Mr. Md. Abul Khayer and his 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 jointly acquiring more than 10% shares of “SONALIPAPR” without following the mentioned law.





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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক মার্চ ১০, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৪৪৭ স্মারকমূলে Md. Abul Khayer and his associates (Associates are Mr. Md. Abul Khayer, Mr. Abul Kalam Matber, Ms. Kazi Sadia Hasan, Mr. Sajed Matber, Mr. Mohammad Basher, Ms. Konika Afroze, Mr. Kazi Farid Hasan, DIT Co-operative Ltd., Monarch Holdings Ltd., Monarch Hotel & Resort Ltd., Softvation Ltd., Shakib Al Hasan and Javed A Matin)-কে মার্চ ২১, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে শুনানীতে Monarch Holdings Ltd. এর পক্ষে Mr. Md. Abul Khayer (on behalf) উপস্থিত হয়ে মার্চ ২১, ২০২২ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

*"With due respect, I, hereby would like to take the opportunity to explain my position in respect of your letter no. BSEC/Enforcement/3270/2022/447 dated March 10, 2022 regarding SONALIPAPR.*

*Pursuant to your above-mentioned letter, we have tried to trade significant quantity of shares to improve the market scenario after COVID - 19 business rebound stage when volume is required to strengthen the capital market and match with the overall development of Bangladesh economy. Bangladesh Capital market is in the stage of development and growth is very slow compared to the economy that is evident from GDP growth rate. It has huge scope of growth compared to the Bangladesh economy and market capitalization to GDP ratio of neighboring counties.*

*I strongly believe that capital market of Bangladesh is under valued and has huge scope of growth but for which it needs strong Management team in both regulatory level and DSE/CSE level. Our leader, the daughter of Bangabandhu HH Prime Minister Sheikh Hasina M.P. is working relentlessly for the development of Bangladesh economy as well as for the development of Bangladesh Capital Market. Thus, she chosen current Chairman of BSEC along with his team members, Commissioners, for the development of Capital market of Bangladesh.*

*Considering the above-mentioned situation, I am always trying to find out the undervalued shares and purchased the same for the capital gain. For the shares of Sonalipaper, I tried to induced myself due to its under-value nature and purchased the same for capital gain.*

*In addition to the above, we have given buy order to our concerned trader to buy the mentioned shares of Sonlipaper on the different dates but not for manipulative purpose. This is fresh buy and sales of shares. We believe that the price of Sonlipaper is undervalued that's why we given this buy order to purchase shares. We have no other motive but to get the opportunity to get the gain from undervalued shares which is evident from its current price.*

*I always try to comply rules and regulation at the time trade. In addition to this, my trade volume helps to provide sufficient liquidity in the market which ultimately increase the turnover of the exchanges.*





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*Regarding significant holding of shares, as far as I know it will be applicable for individual persons only with reference to section 6 and 7 of BSEC Rules (significant share holdings, purchase and taking of authority) 2002. The persons mentioned in the letter have their own earnings and they are independent person. However, if any advertent mistakes have happened, I am extremely sorry for that.*

*Regarding I sincerely apologize for the inadvertent mistakes/ contravention that had happened through the abovementioned trades. It has happened due to my ignorance of the fact not intentional. I am assuring that I will be more careful for future transaction."*

যেহেতু, Mr. Md. Abul Khayer, Mr. Abul Kalam Matber, Ms. Kazi Sadia Hasan, Mr. Sajed Matber, Mr. Mohammad Basher, Ms. Konika Afroze, Mr. Kazi Farid Hasan, DIT Co-operative Ltd. Monarch Holdings Ltd. Monarch Hotel & Resort Ltd., Softvation Ltd. Shakib Al Hasan, Javed A Matin সম্মিলিতভাবে স্বল্প সময়ে Sonali Paper & Board Mills Limited (SONALIPAPR)-এর শেয়ার Series Transaction করেছেন যার ফলে শেয়ারটির বাজারমূল্য অর্থোত্তিকভাবে বৃদ্ধি পেয়েছে, যা Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এর সুস্পষ্ট লঙ্ঘন। উল্লিখিত কাজের মাধ্যমে তারা একটি কৃত্রিম বাজার সৃষ্টি ও পুঁজিবাজারের সাধারণ বিনিয়োগকারীদের শেয়ার ক্রয়ের জন্য প্রভাবিত করার অপপ্রয়াস চালিয়েছেন। উক্ত আইন ইচ্ছাকৃতভাবে (Willfully) লঙ্ঘনের ফলে উহা Securities and Exchange Ordinance, 1969 এর Section 22 এর আওতায় দণ্ডনীয় অপরাধ।

যেহেতু, Mr. Md. Abul Khayer, Mr. Abul Kalam Matber, Ms. Kazi Sadia Hasan, Mr. Sajed Matber, Mr. Mohammad Basher, Ms. Konika Afroze, Mr. Kazi Farid Hasan, DIT Co-operative Ltd. Monarch Holdings Ltd. Monarch Hotel & Resort Ltd., Softvation Ltd. Shakib Al Hasan, Javed A Matin সম্মিলিতভাবে Sonali Paper & Board Mills Limited (SONALIPAPR) -এর শেয়ার লেনদেন করে বিভিন্ন তারিখে কোম্পানীটির ১০% বা তার অধিক শেয়ার ধারণ করেছেন। এর মাধ্যমে সুস্পষ্টভাবে এবং ইচ্ছাকৃতভাবে (Willfully) তারা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লঙ্ঘন করেছেন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এর আওতায় দণ্ডনীয় অপরাধ।

যেহেতু, Monarch Holdings Ltd.-এর উল্লিখিত বক্তব্য এবং তদন্ত 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 Monarch Holdings Ltd.-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Monarch Holdings Ltd.-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লঙ্ঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Monarch Holdings Ltd.-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;



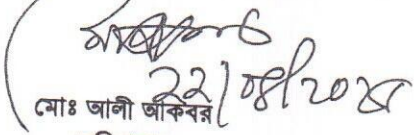
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যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Monarch Holdings Ltd.-কে জরিমানা করা প্রয়োজন ও সমীচীন;

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] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত ক্ষমতাবলে-

- Monarch Holdings Ltd.-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘন করায় ২.০০ (দুই) কোটি টাকা এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লঙ্ঘন করায় ১.০০ (এক) লক্ষ টাকা [মোট ২.০১ (দুই কোটি এক 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,

  
মোঃ আলী আকবর  
কমিশনার

বিতরণ:

- ১। Monarch Holdings Ltd.  
(BOID: 1605110071212010)  
10/B, Arambagh, (1<sup>st</sup> Floor), Dhaka-1000.