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

নং-বিএসইসি/এনফোর্সমেন্ট/৩০১৩(পার্ট-২)/২০২১/৪৮৯
তারিখঃ এপ্রিল ০৮, ২০২৫

Mr. Md. Abul Khayer
(BOID: 1605530052137148, 1201950062164535)
Rashid Place, House # 356/2, Road # 20
Block # A, Khilgaon, Dhaka.

বিষয়: আদেশ।

কমিশনের আদেশ নং- **বিএসইসি/এনফোর্সমেন্ট/৩০১৩(পার্ট-২)/২০২১/৪৮৮ তারিখঃ এপ্রিল ০৮, ২০২৫** এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

08/04/2025

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
IP PABX: 88-02-09609-100600, Ext- 1220
ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমএসআই, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/MSI/2021-1001 (Vol: 02)]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

13.4.25
D/DD (MLS)
১৬/০৪/২৫
Mr. Niloy. AD

Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

নং-বিএসইসি/এনফোর্সমেন্ট/৩০১৩(পার্ট-২)/২০২১/৪৮৮

তারিখঃ এপ্রিল ০৮, ২০২৫

আদেশ

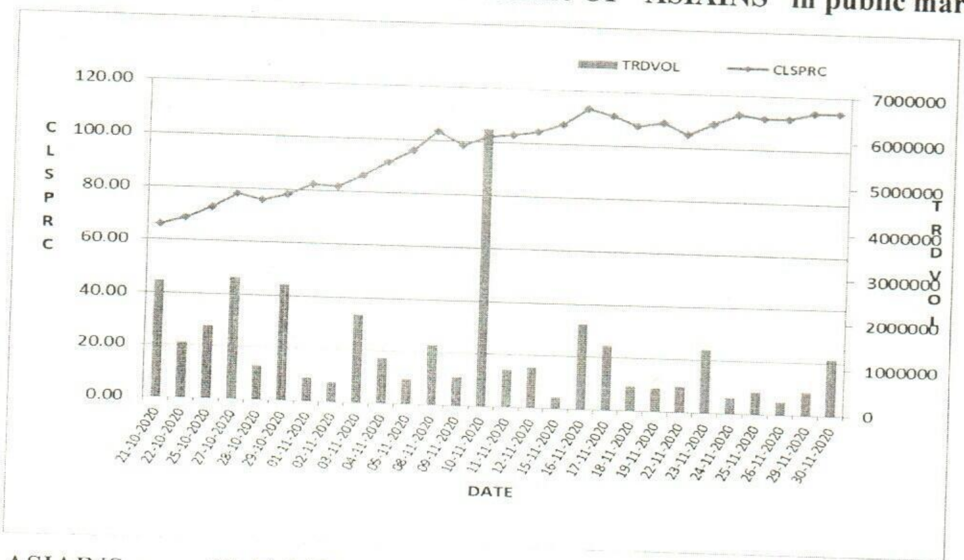
যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, নভেম্বর ৩০, ২০২০ তারিখের DSE Surveillance Note- 066/2020 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 ২২ অক্টোবর ২০২০ হতে ৩০ নভেম্বর ২০২০ পর্যন্ত সময়ে Asia Insurance Limited (ASIAINS)-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:

Description of alleged violation of securities laws:

Pursuant to Surveillance Note- 066/2020 dated November 30, 2020 and in exercise of the power conferred by Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013, the investigation team of DSE investigated share trading of Asia Insurance Limited (ASIAINS) and prepared this report. The investigation team investigated regarding share trading of "ASIAINS" for the period from **22.10.2020 to 30.11.2020** and prepared a report. The investigation committee submitted the investigation report to the Commission. The investigation team randomly examined the documents collected from different TREC holders of clients regarding share trading of Asia Insurance Limited. After examining the investigation report it appears, among others, that:

Trends of closing price and trade volume OF "ASIAINS" in public market



YCP of ASIAINS as on 22.10.2020 was Tk. 65.90 and closing price of ASIAINS was Tk. 114.10 as on 30-11-2020. During this period the investigation team found that the price of 'ASIAINS' share was increased by Tk. 48.20 which is approximately 73.14% higher compared to closing price on 21-10-2020.

Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

A. Mr. Md. Abul Khayer, Ms. Kazi Sadia Hasan and their associates:

Observation-1:

D I T Co-Operative Limited (Client code # 7022 of UCB Stock Brokerage Limited) was the top trader of "ASIAINS" share from the period of 22.10.2020 to 30.11.2020. After examining account opening forms and relevant documents, it was revealed that Md. Abul Khayer is the chairman and Kazi Sadia Hasan is the treasurer of D I T Co-Operative Limited. It was also found that Md. Abul Khayer was associated with seven accounts from which they traded shares of "ASIAINS" during the investigation period. Details of the accounts are given below:

S.L.	Name	Client Code	BO ID	TREC Holder's Name	Remarks
1	D I T CO-OPERATIVE LTD.	7022	1205590065757811	UCB Stock Brokerage Limited	Md. Abul Khayer is the chairman and Kazi Sadia Hasan is the treasurer of the company
2	Kazi Sadia Hasan	3898	1205590068284973	UCB Stock Brokerage Limited	Md. Abul Khayer is the husband and nominee of the account holder
3	Kazi Sadia Hasan	S2131	1604530066385504	SBL Capital Management Limited	Md. Abul Khayer is the husband and nominee of the account holder
4	D I T CO-OPERATIVE LTD.	S2116	1604530065757811	SBL Capital Management Limited	Md. Abul Khayer is the chairman and Kazi Sadia Hasan is the treasurer of the company
5	Md. Abul Khayer	S11118	1605530052137148	Southeast Bank Capital Services Ltd	Single Account
6	Md. Abul Khayer	42080	1201950062164535	EBL Securities Limited	Single Account
7	D I T CO-OPERATIVE LTD.	43319	1201950065757811	EBL Securities Limited	Md. Abul Khayer is the chairman and Kazi Sadia Hasan is the treasurer of the company

Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

Individual Trade Patterns, Trade monitoring screenshots and Effects of "ASIAINS" at DSE by Mr. Md. Abul Khayer, Kazi Sadia Hasan and their associates from 22.10.2020 to 30.11.2020 are given below:

a) Individual Trade Patterns of Md. Abul Khayer, Kazi Sadia Hasan and their associates (Only Public Market):

Date	Code # 7022				Code # 3898				Code # S2131				Code # S2116				Code # S11118				Code # 42080			
	BO ID # 1205590065757811				BO ID # 1205590068284973				BO ID # 1604530066385504				BO ID # 1604530065757811				BO ID # 1605530052137148				BO ID # 1201950062164535			
	D I T CO-OPERATIVE LTD.				KAZI SADIA HASAN				Kazi Sadia Hasan				D I T CO-OPERATIVE LTD.				Md. Abul Khayer				Md. Abul Khayer			
	UCB Stock Brokerage Limited				UCB Stock Brokerage Limited				SBL Capital Management Limited				SBL Capital Management Limited				Southeast Bank Capital Services Ltd				EBL Securities Limited			
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)
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
22-10-2020	170000	70.84	133560	69.98	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-10-2020	400000	75.15	176774	72.77	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-10-2020	753273	77.55	673442	77.32	0	0.00	0	0.00	0	0.00	0	0.00	109039	77.94	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	121346	75.33	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-10-2020	851366	78.11	1095491	78.58	0	0.00	0	0.00	29135	77.79	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-11-2020	100000	80.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	39650	84.16	0	0.00
02-11-2020	80882	86.58	2900	87.19	0	0.00	0	0.00	0	0.00	10000	85.70	0	0.00	0	0.00	0	0.00	0	0.00	29500	83.89	0	0.00
03-11-2020	0	0.00	1100000	86.73	1100000	86.73	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-11-2020	61654	91.95	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-11-2020	257329	96.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-11-2020	158161	102.62	501500	103.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10000	97.68	0	0.00
10-11-2020	1818150	104.73	1797610	106.00	953084	104.88	900000	104.58	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	37014	101.87	27500	101.18
11-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	208198	102.82	206027	103.00	0	0.00	0	0.00	0	0.00	0	0.00
12-11-2020	5253	103.39	0	0.00	7604	103.09	0	0.00	155916	103.04	140000	103.70	12112	102.27	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-11-2020	0	0.00	1377743	114.44	0	0.00	0	0.00	0	0.00	0	0.00	16300	113.46	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-11-2020	475000	109.90	474341	112.26	234000	110.60	0	0.00	0	0.00	0	0.00	0	0.00	2000	115.00	0	0.00	0	0.00	0	0.00	0	0.00
19-11-2020	0	0.00	0	0.00	62303	106.98	0	0.00	130509	104.30	17063	107.67	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-11-2020	402233	105.17	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-11-2020	1020000	108.86	0	0.00	90000	107.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-11-2020	0	0.00	0	0.00	38000	114.28	0	0.00	0	0.00	0	0.00	54687	113.65	100000	114.00	0	0.00	0	0.00	0	0.00	0	0.00
25-11-2020	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	111.00	0	0.00	0	0.00	88000	114.80
26-11-2020	0	0.00	0	0.00	0	0.00	5991	111.69	0	0.00	0	0.00	2000	111.50	0	0.00	100376	112.65	0	0.00	0	0.00	0	0.00
29-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1100	108.70	0	0.00	0	0.00	241390	114.58	5000	111.80	0	0.00	0	0.00
30-11-2020	0	0.00	0	0.00	0	0.00	825000	117.48	1549	114.20	0	0.00	0	0.00	0	0.00	11155	115.13	0	0.00	0	0.00	0	0.00
Total	6553301		7333361		2484991		1730991		438455		168163		402336		308027		362921		5000		116164		115500	

Date	Code # 42080				Code # 43319				Total					
	BO ID # 1201950062164535				BO ID # 1201950065757811									
	Md. Abul Khayer				D I T CO-OPERATIVE LTD.									
	EBL Securities Limited				EBL Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00						
22-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	170000	70.84	12041951.10	133560	69.98	9346200.00
25-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	400000	75.15	30058793.00	176774	72.77	12863536.50
27-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	862312	77.60	66912485.00	673442	77.32	52073852.80
28-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	121346	75.33	9141432.30	0	0.00	0.00
29-10-2020	0	0.00	0	0.00	0	0.00	0	0.00	880501	78.10	68767097.50	1095491	78.58	86088623.10
01-11-2020	39650	84.16	0	0.00	17000	83.60	0	0.00	156650	81.95	12838122.00	0	0.00	0.00
02-11-2020	29500	83.89	0	0.00	0	0.00	0	0.00	110382	85.86	9477067.50	12900	86.04	1109853.00
03-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	1100000	86.73	95400000.00	1100000	86.73	95400236.8
04-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	61654	91.95	5669298.80	0	0.00	0.00
05-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	257329	96.00	24702927.10	0	0.00	0.00
08-11-2020	10000	97.68	0	0.00	1000	98.70	0	0.00	169161	102.31	17306599.40	501500	103.60	51955550.00
10-11-2020	37014	101.87	27500	101.18	2071	100.50	1071	100.40	2810319	104.74	294349657.20	2726181	105.48	287554053.40
11-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	208198	102.82	21407117.80	206027	103.00	21220781.00
12-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	180885	103.00	18631889.50	140000	103.70	14518000.00
16-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	16300	113.46	1849350.00	1377743	114.44	157662501.70
17-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	709000	110.13	78082900.00	476341	112.28	53481665.20
19-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	192812	105.16	20277065.70	17063	107.67	1837247.30
22-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	402233	105.17	42301112.60	0	0.00	0.00
23-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	1110000	108.73	120685463.00	0	0.00	0.00
24-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	92687	113.90	10557459.10	100000	114.00	11400000.00
25-11-2020	0	0.00	88000	114.80	0	0.00	16878	115.10	10000	111.00	1110000.00	104878	114.85	12045057.80
26-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	102376	112.63	11530379.30	5991	111.69	669158.30
29-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	241390	114.58	27659647.40	6100	111.24	678570.00
30-11-2020	0	0.00	0	0.00	0	0.00	0	0.00	12704	115.01	1461122.20	825000	117.48	96922500.00
Total	116164		115500		20071		17949		10378239			9678991		
									170000	70.84	12041951.10	133560	69.98	9346200.00

b) Effects of "ASIAINS" at DSE (both Public Market and Block Market) by Md. Abul Khayer, Kazi Sadia Hasan and their associates:

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Cl Tr (
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	1
Opening Balance										3131345	51.16	160196672.86						
22-10-2020	170000	70.84	12041951.10	133560	69.98	9346200.00	0	52.17	6968126.81	3167785	52.17	165270497.15	1241671	68.60	4.10%	13.69%	10.76%	24.4
25-10-2020	550000	74.21	40813793.00	176774	72.77	12863536.50	0	55.43	9798937.89	3541011	55.43	196285352.26	1740955	72.60	5.83%	31.59%	10.15%	41.7
27-10-2020	862312	77.60	66912485.00	673442	77.32	52073852.80	0	59.77	40253344.56	3729881	59.77	222944492.70	2707773	77.80	7.16%	31.85%	24.87%	56.7
28-10-2020	121346	75.33	9141432.30	0	0.00	0.00	0	0.00	0.00	3851227	60.26	232085925.00	739939	76.00	-2.31%	16.40%	0.00%	16.4
29-10-2020	880501	78.10	68767097.50	1095491	78.58	86088623.10	0	63.58	69653576.55	3636237	63.58	231199445.95	2597374	78.10	2.76%	33.90%	42.18%	76.0
01-11-2020	156650	81.95	12838122.00	0	0.00	0.00	0	0.00	0.00	3792887	64.34	244037567.95	524663	82.20	5.25%	29.86%	0.00%	29.8
02-11-2020	110382	85.86	9477067.50	12900	86.04	1109853.00	0	64.95	837846.12	3890369	64.95	252676789.32	441051	81.70	-0.61%	25.03%	2.92%	27.9
03-11-2020	1100000	86.73	95400000.00	1100000	86.73	95400236.80	0	69.75	76724680.73	3890369	69.75	271352108.59	1934542	86.00	5.26%	56.86%	56.86%	113.7
04-11-2020	61654	91.95	5669298.80	500000	84.70	42350000.00	0	70.10	35048051.01	3452023	70.10	241973356.38	1501876	91.40	6.28%	4.11%	33.29%	37.4
05-11-2020	257329	96.00	24702927.10	0	0.00	0.00	0	0.00	0.00	3709352	71.89	266676283.48	539949	96.20	5.25%	47.66%	0.00%	47.66
08-11-2020	169161	102.31	17306599.40	501500	103.60	51955550.00	0	73.22	36719592.22	3377013	73.22	247263290.67	1313641	103.30	7.38%	12.88%	38.18%	51.05
10-11-2020	2810319	104.74	294349657.20	2726181	105.48	287554053.40	0	87.54	238638386.92	3461151	87.54	302974560.94	6112547	102.10	3.76%	45.98%	44.60%	90.58
11-11-2020	208198	102.82	21407117.80	206027	103.00	21220781.00	0	88.40	18213417.18	3463322	88.40	306168261.56	822899	102.70	0.59%	25.30%	25.04%	50.34
12-11-2020	180885	103.00	18631889.50	140000	103.70	14518000.00	0	89.13	12477891.94	3504207	89.13	312322259.12	950287	104.40	1.66%	19.03%	14.73%	33.77
16-11-2020	16300	113.46	1849350.00	1377743	114.44	157662501.70	0	89.24	122950397.56	2142764	89.24	191221211.56	1864533	113.50	5.78%	0.87%	73.89%	74.77
17-11-2020	709000	110.13	78082900.00	476341	112.28	53481665.20	0	94.43	44982891.22	2375423	94.43	224321220.34	1399653	111.10	-2.11%	50.66%	34.03%	84.69
19-11-2020	192812	105.16	20277065.70	17063	107.67	1837247.30	0	95.24	1625077.36	2551172	95.24	242973208.68	503740	108.90	1.40%	38.28%	3.39%	41.66
22-11-2020	402233	105.17	42301112.60	0	0.00	0.00	0	0.00	0.00	2953405	96.59	285274321.28	556429	104.90	-3.67%	72.29%	0.00%	72.29
23-11-2020	1110000	108.73	120685463.00	0	0.00	0.00	0	0.00	0.00	4063405	99.91	405959784.28	1398508	108.90	3.81%	79.37%	0.00%	79.37
24-11-2020	92687	113.90	10557459.10	100000	114.00	11400000.00	0	100.22	10021848.49	4056092	100.22	406495394.89	355291	112.70	3.49%	26.09%	28.15%	54.23
25-11-2020	10000	111.00	1110000.00	104878	114.85	12045057.80	0	100.25	10513495.17	3961214	100.25	397091899.72	476436	111.70	-0.89%	2.10%	22.01%	24.11
26-11-2020	102376	112.63	11530379.30	5991	111.69	669158.30	0	100.56	602436.78	4057599	100.56	408019842.24	292884	111.50	-0.18%	34.95%	2.05%	37.00
29-11-2020	241390	114.58	27659647.40	6100	111.24	678570.00	0	101.34	618202.30	4292889	101.34	435061287.34	496225	114.10	2.33%	48.65%	1.23%	49.87
30-11-2020	12704	115.01	1461122.20	854000	117.23	100112500.00	0	101.38	86582762.87	3451593	101.38	349939646.66	1261943	114.10	0.00%	1.01%	67.67%	68.68
Total	10528239	96.21	1012973937.50	10207991	99.17	1012367386.90	0	80.65	823230963.70	3451593	101.38	349939646.66						

c) Trade monitoring screenshots of Md. Abul Khayer, Kazi Sadia Hasan and their associates (only public market):

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of Md. Abul Khayer, Kazi Sadia Hasan and their associates were observed which influenced the price of ASIAINS.

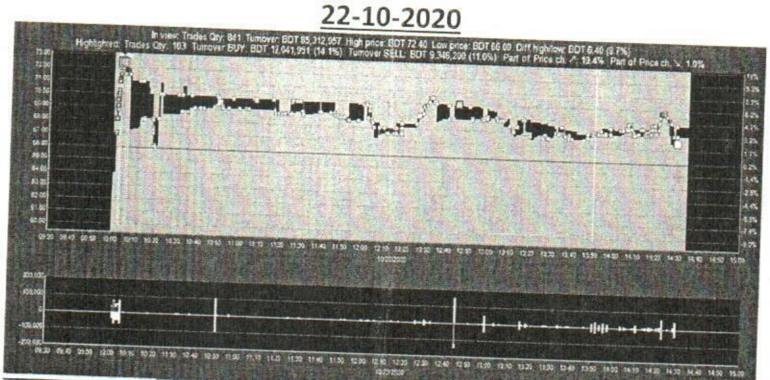
The details of the graphs are given below:

- Light blue area indicates bid price
- Pink area indicates ask price
- Black area indicates spread between ask and bid prices
- Green cube represents trade of **ASIAINS** by Md. Abul Khayer, Kazi Sadia Hasan and their associates
- White cube represents trade of **ASIAINS** by other clients
- The green straight line in the graph is YCP line

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Md. Abul Khayer, Kazi Sadia Hasan and their associates were involved in trading of shares of ASIAINS which influenced price of the said shares on several dates:

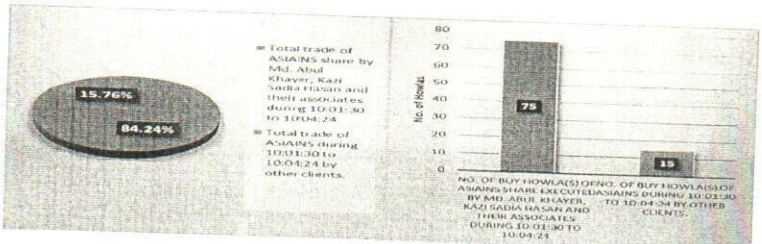
BOIDs: 1205590065757811, 1205590068284973, 1604530066385504, 1604530065757811, 1605530052137148, 1201950062164535 and 1201950065757811 (Combined):

22-10-2020



It was observed in the above graph that on 22-10-2020, total number of trades of ASIAINS in the market was 841, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates were 103 which is approximately 12.25% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 85,312,957 whereas buy turnover by the said clients were BDT 12,041,951 which is approximately 14.1% of the total turnover in the market. It is evident that the client had significant participation in the market on 22-10-2020 in trading of ASIAINS share.

On 22-10-2020, trading of ASIAINS share was started at Tk. 66.90 which was 1.0 more than the YCP of Tk. 65.90. On that day, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at 10:01:30 at price Tk. 66.90 and induced the same to rise to Tk. 72.40 till 10:04:24. It can be observed from the above graph that the said clients executed significant trades during this time period. From 10:01:30 to 10:04:24, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 170,000 shares of ASIAINS compared to the total traded share of 201,800, as shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 75 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 90 as shown in the aforementioned Bar Chart.

It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 84.24% trades from 10:01:30 to 10:04:24 on 22-10-2020. Thus it appeared that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

Bangladesh Securities and Exchange Commission

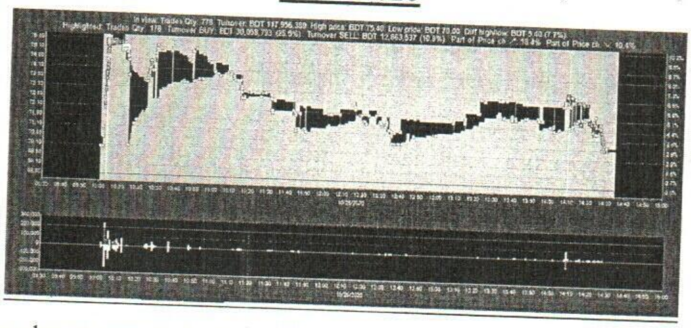
Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

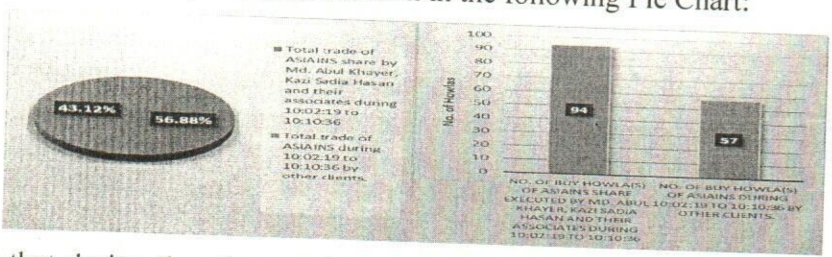
www.sec.gov.bd

25-10-2020



It was observed in the above graph that on 25-10-2020, total number of trades of ASIAINS in the market was 778, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates were 178 which is approximately 22.88% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 117,956,389 whereas buy turnover by the said clients was BDT 30,058,793 which is approximately 25.5% of the total turnover in the market. It is evident that the client had significant participation in the market on 25-10-2020 in trading of ASIAINS share.

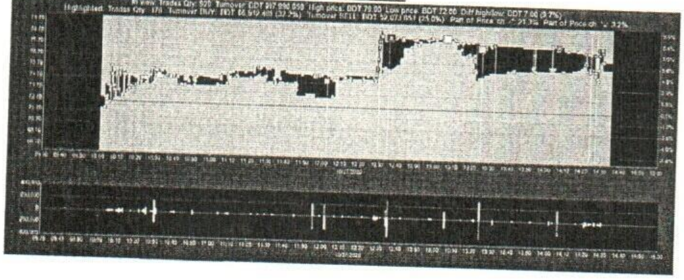
On 25-10-2020, trading of ASIAINS share was started at Tk. 70.00 which is Tk. 1.40 higher than YCP of Tk. 68.60. On that day, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at 10:02:19 at price Tk. 72.20 and induced the same to rise to Tk. 75.40 till 10:10:36. It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 10:02:19 to 10:10:36, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 400,000 shares of ASIAINS compared to the total traded share of 703,254. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 94 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 151 as shown in the aforementioned Bar Chart.

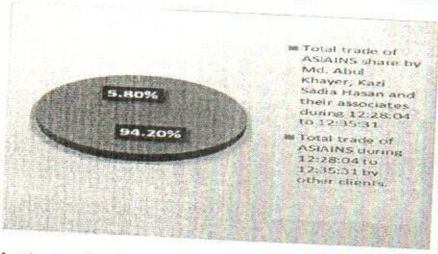
It can be observed from the above graph and screenshot that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 56.88% trades of ASIAINS from 10:02:19 to 10:10:36 on 25-10-2020 and significant trades on that day. From 10:02:19 to 10:10:36, Md. Abul Khayer, Kazi Sadia Hasan and their associates induced the price to rise from Tk. 72.20 to Tk. 75.40. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

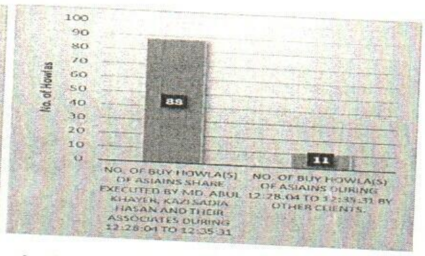
27-10-2020



It is observed in the above graph that on 27-10-2020, total number of trades of ASIAINS in the market was 928, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates were 178 which is approximately 19.18% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 207,990,858 whereas buy turnover by the said clients were BDT 66,912,485 which is approximately 32.2% of the total turnover in the market. It is evident that the client had major participation in the market on 27-10-2020 in trading of ASIAINS share.

On 27-10-2020, trading of ASIAINS share was started at Tk. 72.00 which is Tk. 0.6 less than the YCP of Tk. 72.60. On that day, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at 12:28:04 at price Tk. 75.30 and induced the same to rise to Tk. 78.90 till 12:35:31. It is mentionable that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 12:28:04 to 12:35:31, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 503,273 shares of ASIAINS compared to the total traded share of 534,273. This is shown in the following Pie Chart:

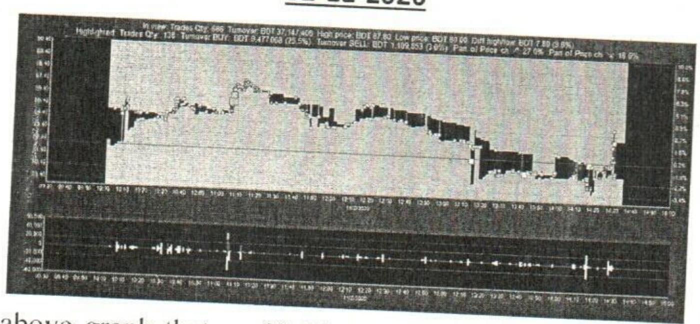




It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 88 howlas to purchase ASIAINS shares compared to the total number of howlas of 99 as shown in the aforementioned Bar Chart.

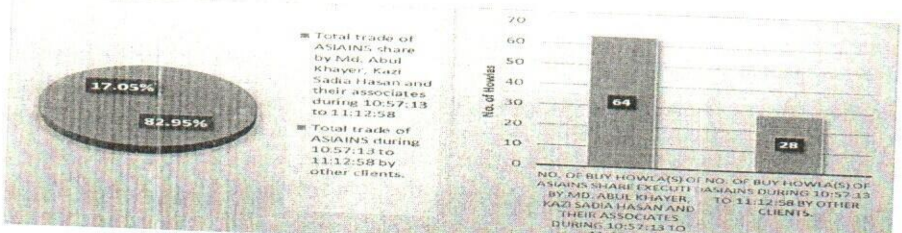
It can be observed from the above graphs that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 94% trades of ASIAINS from 12:28:04 to 12:35:31 on 27-10-2020. Thus it appeared that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share on that day.

02-11-2020



It is observed in the above graph that on 02-11-2020, total number of trades of ASIAINS in the market was 686, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates was 138 which is approximately 20.12% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 37,147,408 whereas buy turnover by the said clients were BDT 9,477,068 which is approximately 25.5% of the total turnover in the market. It is evident that the client had significant participation in the market on 02-11-2020 in trading of ASIAINS share.

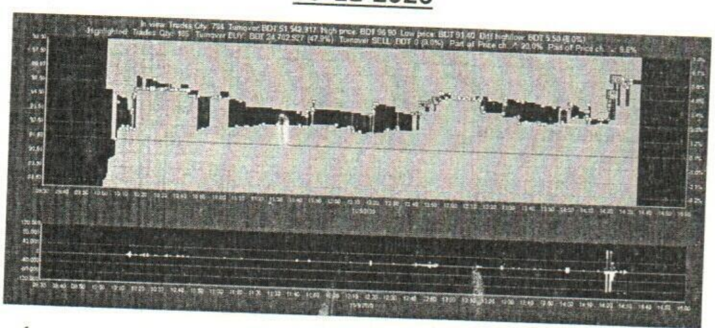
On 02-11-2020, trading of ASIAINS share was started at Tk. 85.00 which is Tk. 2.80 higher than YCP of Tk. 82.20. At around 10:57:13, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 85.00 and induced the same to rise to Tk. 87.80 till 11:12:58. It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 10:57:13 to 11:12:58, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 73,410 shares of ASIAINS compared to the total trade 88,503 as shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 64 howlas to purchase ASIAINS shares compared to the total number of howlas of 92 as shown in the aforementioned Bar Chart.

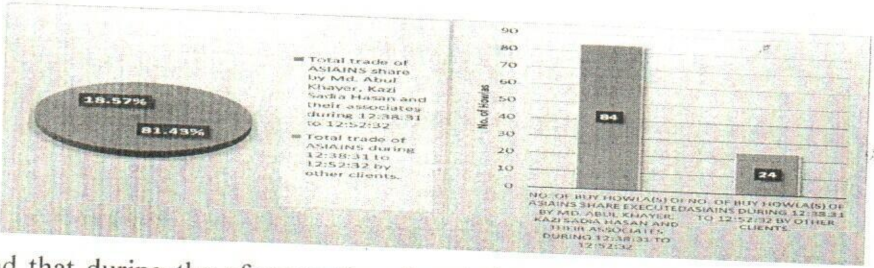
It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed almost 83% trades from 10:57:13 to 11:12:58 on 02-11-2020. During this period, Md. Abul Khayer, Kazi Sadia Hasan and their associates induced the price to rise from Tk. 85.00 to Tk. 87.80. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

05-11-2020



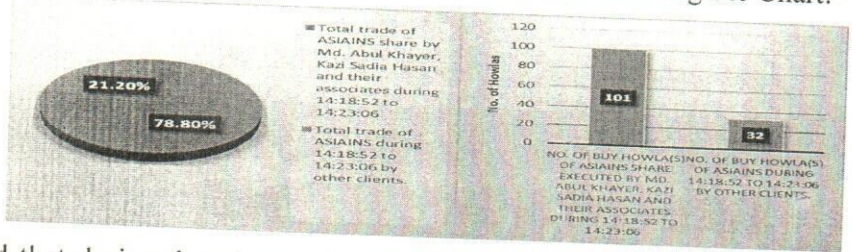
It is observed in the above graph that on 05-11-2020, total number of trades of ASIAINS in the market was 784, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates was 186 which is approximately 23.72% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 51,542,317 whereas buy turnover by the said clients was BDT 24,702,927 which is approximately 47.9% of the total turnover in the market. It is evident that the client had significant participation in the market on 05-11-2020 in trading of ASIAINS share.

On 05-11-2020, trading of ASIAINS share was started at Tk. 91.40 which is same as YCP of Tk. 91.40. At around 12:38:31, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 93.90 and induced the same to rise to Tk. 95.00 till 12:52:32. It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 12:38:31 to 12:52:32, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 56,594 shares of ASIAINS compared to the total trade 69,504 as shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 84 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 108 as shown in the abovementioned Bar Chart.

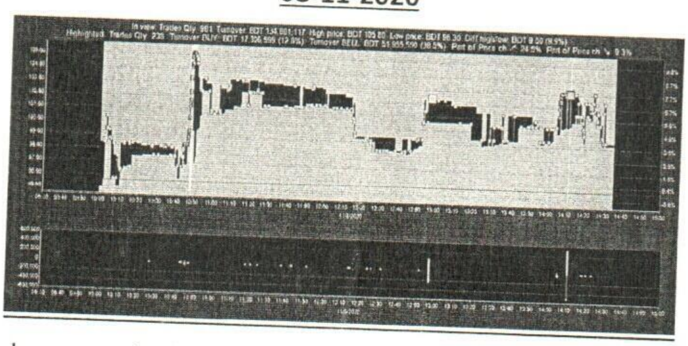
At around 14:18:52, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 94.00 and induced the same to rise to Tk. 96.80 till 14:23:06. From 14:18:52 to 14:23:06, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 200,685 shares of ASIAINS compared to the total trade 254,685 as shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 101 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 133 as shown in the abovementioned Bar Chart.

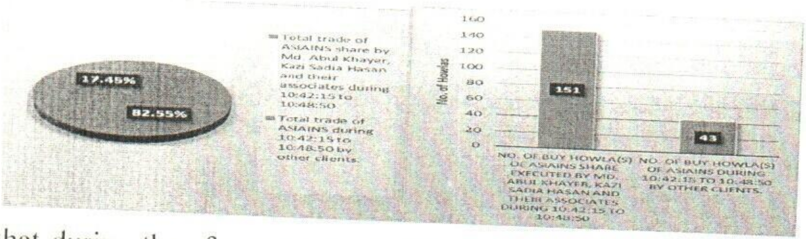
It can be observed from the above graphs that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed almost 81% trades from 12:38:31 to 12:52:32 and almost 79% trades of ASIAINS share from 14:18:52 to 14:23:06 on 05-11-2020. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

08-11-2020



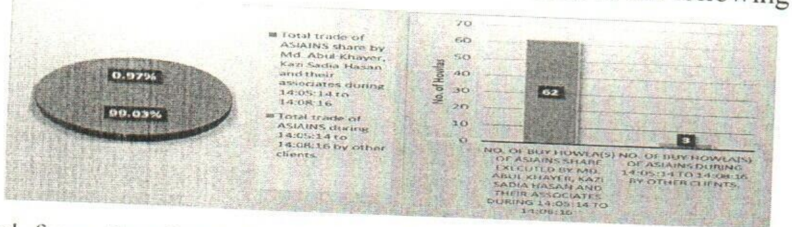
It is observed in the above graph that on 08-11-2020, total number of trades of ASIAINS in the market was 981, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates was 238 which is approximately 24.26% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 134,801,117 whereas buy turnover by the said clients was BDT 17,306,599 which is approximately 12.8% of the total turnover in the market. It is evident that the client had significant participation in the market on 08-11-2020 in trading of ASIAINS share.

On 08-11-2020, trading of ASIAINS share was started at Tk. 99.00 which is Tk. 2.80 more than YCP of Tk. 96.20. At around 10:42:15, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 97.30 and induced the same to rise to Tk. 105.80 at 10:48:50. It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 10:42:15 to 10:48:50, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 109,010 shares of ASIAINS compared to the total trade 132,060 as shown in the following Pie Chart:



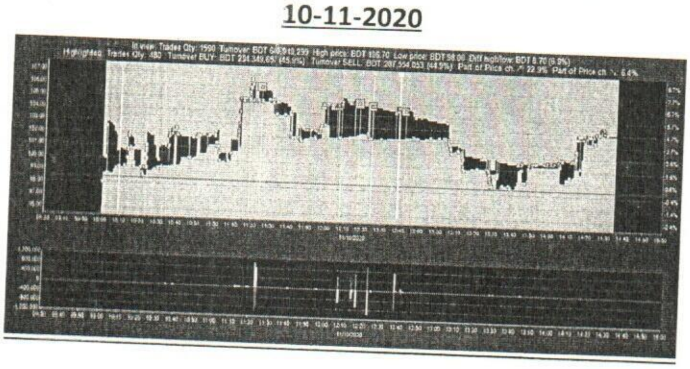
It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 151 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 194 as shown in the abovementioned Bar Chart.

At around 14:05:14, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 101.9 and induced the same to rise to Tk. 103.6 upto 14:08:16. From 14:05:14 to 14:08:16, the said clients bought 58,161 shares of ASIAINS compared to the total trade 58,731 as shown in the following Pie Chart. It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 62 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 65 as shown in the following Bar Chart.



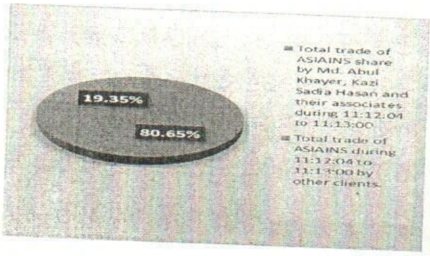
It can be observed from the above graphs that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed almost 82% trades from 10:42:15 to 10:48:50 and almost 99% trades of ASIAINS share from 14:05:14 to 14:08:16 on 05-11-2020. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

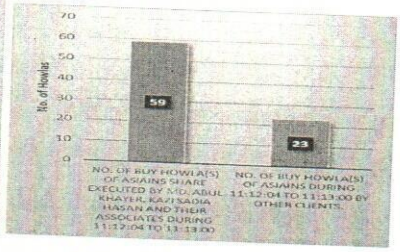
10-11-2020



It was observed in the above graph that on 10-11-2020, total number of trades of ASIAINS in the market was 1590, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates were 480 which is approximately 30.19% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 640,919,299 whereas buy turnover by the said clients was BDT 294,349,657 which is approximately 45.90% of the total turnover in the market. It is evident that the client had significant participation in the market on 10-11-2020 in trading of ASIAINS share.

On 10-11-2020, trading of ASIAINS share was started at Tk. 98.00 which is Tk. 0.40 less than YCP of Tk. 98.40. At around 11:12:04, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 101.70 and induced the same to rise to Tk. 105.00 till 11:13:00. It can be observed from the above graph that the said clients executed significant trades during this time period. From 11:12:04 to 11:13:00, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 50,000 shares of ASIAINS compared to the total trade 62,000 as shown in the following Pie Chart:

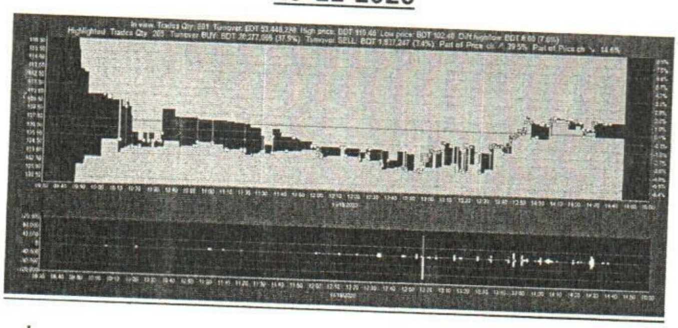




It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 59 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 82 as shown in the aforementioned Bar Chart.

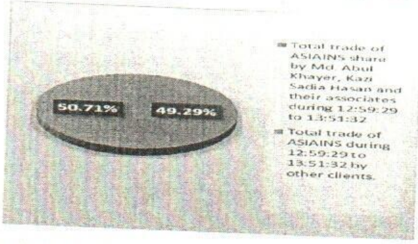
It can be observed from the above graph and screenshot that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 80.65% trades of ASIAINS shares from 11:12:04 to 11:13:00 on 10-11-2020 and significant trades on that day. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

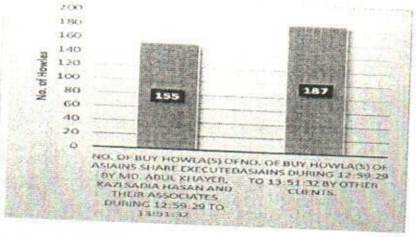
19-11-2020



It was observed in the above graph that on 19-11-2020, total number of trades of ASIAINS in the market was 881, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates were 205 which is approximately 23.27% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 53,448,238 whereas buy turnover by the said clients was BDT 20,277,066 which is approximately 37.90% of the total turnover in the market. It is evident that the client had significant participation in the market on 19-11-2020 in trading of ASIAINS share.

On 19-11-2020, trading of ASIAINS share was started at Tk. 110.40 which is Tk. 3.00 higher than YCP of Tk. 107.40. At around 12:59:29, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 104.40 and induced the same to rise to Tk. 108.80 till 13:51:32. It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades during this time period. From 12:59:29 to 13:51:32, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 83,439 shares of ASIAINS compared to the total trade 169,269 as shown in the following Pie Chart:

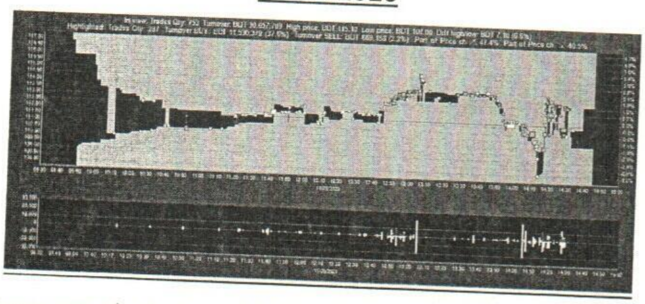




It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 155 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 342 as shown in the aforementioned Bar Chart.

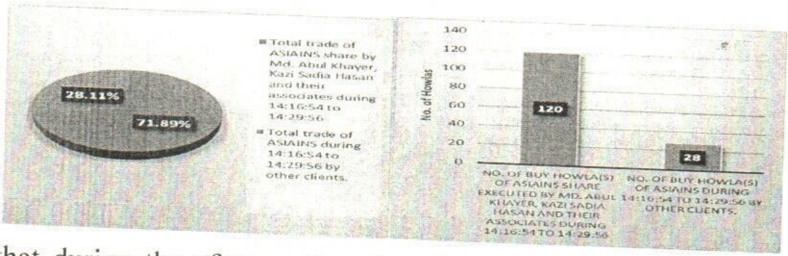
It can be observed from the above graphs that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed significant trades of ASIAINS share on 19-11-2020. Thus it seemed that Md. Abul Khayer, Kazi Sadia Hasan and their associates were actively trying to lift the price of ASIAINS share.

<u>26-11-2020</u>



It is observed in the above graph that on 26-11-2020, total number of trades of ASIAINS in the market was 753, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates was 287 which is approximately 38.11% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 30,657,709 whereas buy turnover by the said clients was BDT 11,530,379 which is approximately 37.6% of the total turnover in the market. It is evident that the client had significant participation in the market on 26-11-2020 in trading of ASIAINS share.

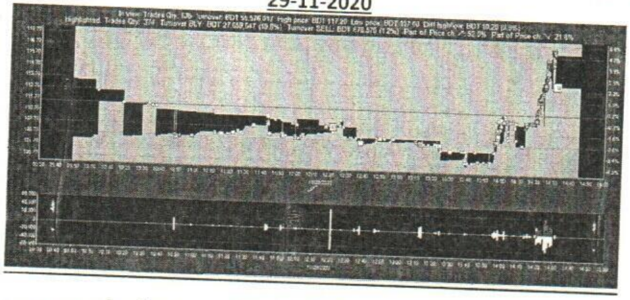
On 26-11-2020, trading of ASIAINS share was started at Tk. 110.00 which is Tk. 1.70 less than YCP of Tk. 111.70. At around 14:16:54, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 110.00 and induced the same to rise to Tk. 113.00 till 14:29:56. From 14:16:54 to 14:29:56, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 51,135 shares of ASIAINS compared to the total trade 71,125 as shown in the following Pie Chart.



It is also found that during the aforementioned period, the said clients executed 120 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 148 as shown in the above-mentioned Bar Chart.

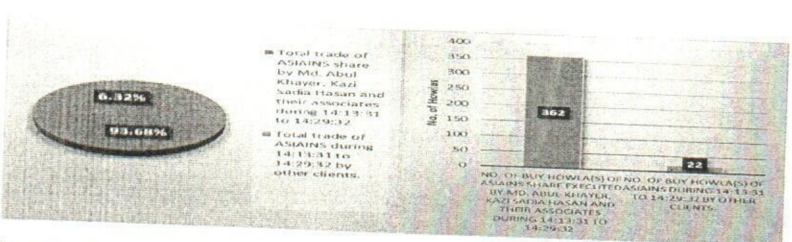
It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed almost 72% trades of ASIAINS from 14:16:54 to 14:29:56 on 26-11-2020. Thus it seemed that the said clients were actively trying to lift the price of ASIAINS share.

29-11-2020



It is observed in the above graph that on 29-11-2020, total number of trades of ASIAINS in the market was 835, whereas number of trades executed by Md. Abul Khayer, Kazi Sadia Hasan and their associates was 374 which is approximately 44.79% of the total number of trades in the market. Again, total turnover of ASIAINS in the market on that day was BDT 55,576,017 whereas buy turnover by the said clients was BDT 27,659,647 which is approximately 49.8% of the total turnover in the market. It is evident that the client had significant participation in the market on 29-11-2020 in trading of ASIAINS share.

On 29-11-2020, trading of ASIAINS share was started at Tk. 110.00 which is Tk. 1.70 less than YCP of Tk. 111.70. At around 14:13:31, Md. Abul Khayer, Kazi Sadia Hasan and their associates started series of trading at price Tk. 110.30 and induced the same to rise to Tk. 117.20 till 14:29:32. It can be observed from the above graph that the said clients executed significant trades during this time period. From 14:13:31 to 14:29:32, Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 238,777 shares of ASIAINS compared to the total trade 254,877 as shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer, Kazi Sadia Hasan and their associates executed 362 howlas to purchase of shares of ASIAINS compared to the total number of howlas of 384 as shown in the aforementioned Bar Chart.

It can be observed from the above graph that Md. Abul Khayer, Kazi Sadia Hasan and their associates executed almost 94% trades of ASIAINS from 14:13:31 to 14:29:32 on 29-11-2020. Thus it seemed that the said clients were actively trying to lift the price of ASIAINS share.

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amou	
150000	71.7	10755000	529000	86.08	45540000	10528239	96.21	1012973938	10207991	99.17	1012367387	80.64	823230963.7	3451593	101.38	3499396	

d) **Gain and Loss by Md. Abul Khayer, Kazi Sadia Hasan and their associates from 22.10.2020 to 30.11.2020:**

Realized Capital gain(loss)per unit	18.53	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	22.97%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	18,91,36,423.20	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (30-11-2020)	114.10	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	12.72	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	12.54%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	4,38,87,114.64	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data it was observed that Md. Abul Khayer, Kazi Sadia Hasan and their associates bought 10,528,239 shares and sold 10,207,991 shares of "ASIAINS" from market during the period from 22.10.2020 to 30.11.2020 with the 7 (seven) BO accounts associated with them. With the said 7 (seven) accounts Md. Abul Khayer, Kazi Sadia Hasan and their associates collectively traded 62.53% of total trade volume and realized a capital gain of Tk. 189,136,423.20 from the trading of "ASIAINS" share during the investigation period.

Findings-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-

……………………………………………………………………………………………………

(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 Md. Abul Khayer, Kazi Sadia Hasan and their associates were involved in a series of transactions through the aforesaid accounts in trading of **ASIAINS** share by creating appearance of active trading and raising of price of the said share.

Contravention(s)-1:

Md. Abul Khayer, chairman of D I T CO-OPERATIVE LTD. (BO ID# 1205590065757811), Kazi Sadia Hasan (BO ID# 1205590068284973) and other accounts associated with them have violated the following:

- **Section 17(e)(v) of the Securities and Exchange Ordinance, 1969** by involving directly and indirectly in a series of transactions of **"ASIAINS"** shares in order to create the appearance of active trading of the said share.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক সেপ্টেম্বর ০৭, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩০১৩(পার্ট-২)/২০২১/১১৮৫ স্মারকমূলে Mr. Md. Abul Khayer, Ms. Kazi Sadia Hasan and their associates (associates are Mr. Md. Abul Khayer, Ms. Kazi Sadia Hasan and D I T Co-Operative Ltd.)-কে সেপ্টেম্বর ১৮, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে শুনানীতে Mr. Md. Abul Khayer উপস্থিত হয়ে সেপ্টেম্বর ১৮, ২০২২ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With due respect, we would like to take the opportunity to explain our position in respect of your letter no. # BSEC/Enforcement/3013(part-2)/2021/1185 dated September 07, 2022 regarding ASIAINS.

Pursuant to your above-mentioned letter, we have tried to trade significant quantity of shares to improve the market scenario and increase the market volume in the very difficult situation like COVID19hit the capital market significantly where market volume reduced to very low and capital market was depressed and volume was required to stabilize the market. We, all know that the current economic data shows significant growth trajectory of Bangladesh Economy under the daughter of Bangabandhu HH Prime Minister Sheikh Hasina M.P., the depressed situation of capital market will not sustain, it must be rebounded significantly. It needs leader with good number of market participants who will work for the development of market like existing Chairman sir along with his team of BSEC.

In addition to the above, we have given buy order to our concerned trader to buy the mentioned shares of ASIAINS on the different dates but not for manipulative purpose. This is fresh buy and sales of shares. We believe that the price of ASIAINS 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.

However, we could not release/ sale the shares in the market which was sold subsequently in a very low price that incurred loss substantially for us. Even we could not recover the financial expenses in some cases that was purchased by taking margin loan from different merchant bank/ brokerages.

We 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.

We sincerely apologize for the inadvertent mistakes/contravention that had happened through the above-mentioned trades. It has happened due to my ignorance of the fact not intentional. We are assuring that we will be more careful for future transaction."

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

যেহেতু, Mr. Md. Abul Khayer স্বল্প সময়ে ASIAINS-এর শেয়ার Series Transaction করেছেন যার ফলে শেয়ারটির বাজারমূল্য অযৌক্তিকভাবে বৃদ্ধি পেয়েছে, যা Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এর সুস্পষ্ট লঙ্ঘন। উল্লিখিত কাজের মাধ্যমে তিনি 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 দন্ডনীয় অপরাধ।

যেহেতু, Mr. Md. Abul Khayer-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমুহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্থ হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mr. Md. Abul Khayer-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Md. Abul Khayer -এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Mr. Md. Abul Khayer-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Md. Abul Khayer-কে জরিমানা করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এ প্রদত্ত ক্ষমতাবলে-

- Mr. Md. Abul Khayer-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে **৪.০০ (চার) কোটি টাকা** অর্থদন্ড ধার্য্য 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,

০৮/০৪/২০২৫
মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। **Mr. Md. Abul Khayer**
(BOID: 1605530052137148, 1201950062164535)
Rashid Place, House # 356/2, Road # 20
Block # A, Khilgaon, Dhaka.