

**Bangladesh Securities and Exchange Commission**  
Enforcement Division  
Enforcement Department  
Market, Market Intermediaries and Other Affairs Section  
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নং-বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭(পার্ট-২)/২০২২/৮৯৫

তারিখঃ নভেম্বর ১০, ২০২৪

**MR. MOMTAZUR RAHMAN**

(BO ID: 1605400019678719, 1201930019678719)

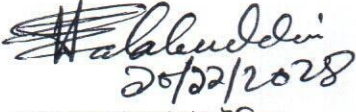
57, Shabujbag, 1<sup>st</sup> Floor, Bashabo

Sabujbag, Dhaka-1214

**বিষয়: আদেশ।**

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭(পার্ট-২)/২০২২/৮৯৫ তারিখঃ নভেম্বর ১০, ২০২৪ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

  
০৭/১২/২০২৪

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। [BSEC/MSI/2021-1009/Vol-3 dated 30.01.2023]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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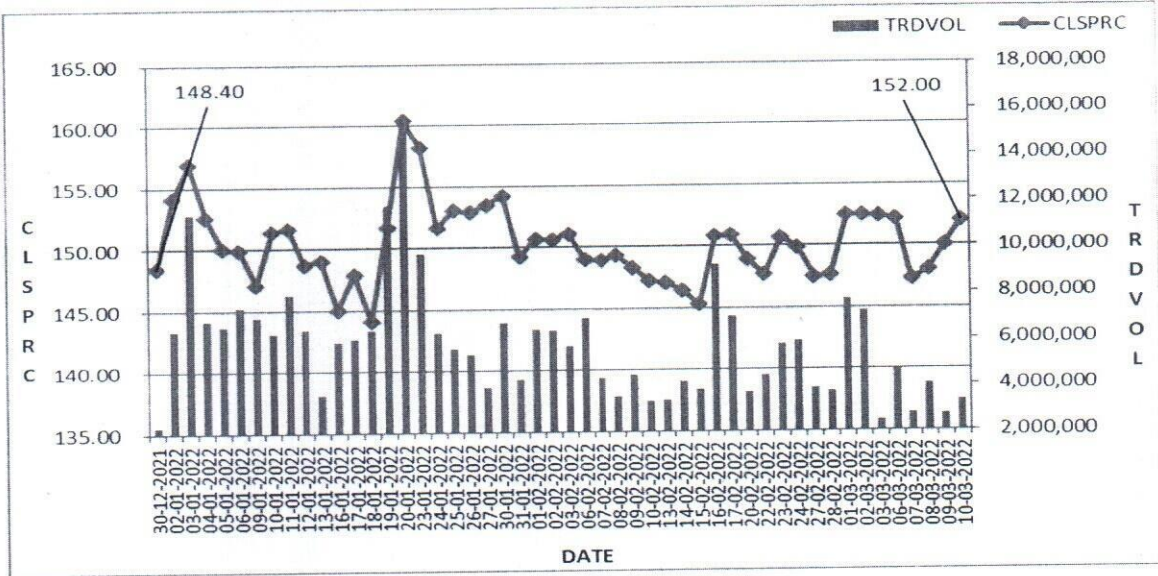
তারিখঃ নভেম্বর ১০, ২০২৪

**আদেশ**

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

যেহেতু, মার্চ ১৫, ২০২২ তারিখের DSE Surveillance Note # 20/2022 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 ০২.০১.২০২২ থেকে ১০.০৩.২০২২ পর্যন্ত সময়কালে Bangladesh Export Import Company Ltd. (BEXIMCO)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

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



YCP of the shares of BEXIMCO as on 02.01.2022 was Tk. 148.40 and closing price of the same was Tk. 152.00 as on 10.03.2022. During this period from 02.01.2022 to 10.03.2022, price of the shares of 'BEXIMCO' was increased by Tk. 3.60 which is approximately 2.4% higher compared to Closing Price of 30.12.2021.

**A. Trading of Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates**

**Observation(s)-1:**

After analyzing documents, it is observed that Jupiter Business Limited represented by **Mr. Mosfequr Rahman**, Client code # J3504 of Janata Capital and Investment Limited (traded through ICB Securities Trading Company Limited) was the 2<sup>nd</sup> top buyer of the shares of "BEXIMCO" from 02.01.2022 to 10.03.2022. During the investigation period, Mr. Mosfequr Rahman actively participated in trading shares of the aforesaid company with an association with 7 (seven) more accounts set out below:



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Individual Trade Patterns, Trade monitoring screenshots, Effects of “BEXIMCO” at DSE in public market by the said client and gain and loss statement are given below:

[illegible]



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**b). Effects of “BEXIMCO” at DSE (both Public Market and Block Market) by Mr. Mosfequr Rahman, Mr. Momtazur Rahman & 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               | Price (W.Avg.)      | Amount               | Qty.            | Price (W.Avg.) | Amount                | Mkt Trade Qty at DSE       | Mkt Close Price at DSE | Market price Changed by | Client Buy (%) | Client Sale (%) | Client Trade (%) |
| Opening Balance |                 |                |                      |                 |                |                      |                     |                      | 104545873       | 109.57         | 11455479193.25        |                            |                        |                         |                |                 |                  |
| 02-01-2022      | 73566           | 152.79         | 11240426.70          | 498739          | 154.20         | 76905553.80          | 109.60              | 54663840.02          | 104120700       | 109.60         | 11412055779.93        | 6504974                    | 154.10                 | 3.84%                   | 1.13%          | 7.67%           | 8.80%            |
| 03-01-2022      | 0               | 0.00           | 0.00                 | 6132552         | 157.83         | 967885392.80         | 109.60              | 672152852.38         | 97988148        | 109.60         | 10739902927.54        | 11519937                   | 156.90                 | 1.82%                   | 0.00%          | 53.23%          | 53.23%           |
| 04-01-2022      | 0               | 0.00           | 0.00                 | 2488066         | 153.62         | 382227867.50         | 109.60              | 272702238.61         | 95500082        | 109.60         | 10467200688.93        | 6969142                    | 152.60                 | -2.74%                  | 0.00%          | 35.70%          | 35.70%           |
| 06-01-2022      | 0               | 0.00           | 0.00                 | 500000          | 150.60         | 75300000.00          | 109.60              | 54802050.79          | 95000082        | 109.60         | 10412398638.14        | 7490503                    | 149.90                 | -0.07%                  | 0.00%          | 6.68%           | 6.68%            |
| 09-01-2022      | 0               | 0.00           | 0.00                 | 4133667         | 149.39         | 617543611.60         | 109.60              | 453066857.79         | 90866415        | 109.60         | 9959331780.35         | 7056603                    | 147.10                 | -1.87%                  | 0.00%          | 58.58%          | 58.58%           |
| 10-01-2022      | 161044          | 149.76         | 24118047.30          | 1000000         | 145.90         | 145900000.00         | 109.68              | 109675145.69         | 90027459        | 109.68         | 9873774681.96         | 6416627                    | 151.40                 | 2.92%                   | 2.51%          | 15.58%          | 18.09%           |
| 11-01-2022      | 228881          | 152.08         | 34808030.00          | 1285392         | 152.78         | 196375950.40         | 109.78              | 141113776.04         | 88970948        | 109.78         | 9767468935.92         | 8014173                    | 151.60                 | 0.13%                   | 2.86%          | 16.04%          | 18.89%           |
| 12-01-2022      | 781070          | 151.41         | 118258260.70         | 1588694         | 150.14         | 238528057.40         | 110.14              | 174986544.40         | 88163324        | 110.14         | 9710740652.21         | 6550719                    | 148.70                 | -1.91%                  | 11.92%         | 24.25%          | 36.18%           |
| 13-01-2022      | 902506          | 149.19         | 134644608.20         | 500000          | 148.90         | 74450750.00          | 110.54              | 55270271.78          | 88565830        | 110.54         | 9790114988.64         | 3668636                    | 149.00                 | 0.20%                   | 24.60%         | 13.63%          | 38.23%           |
| 16-01-2022      | 0               | 0.00           | 0.00                 | 1592962         | 146.33         | 233092945.60         | 110.54              | 176086885.34         | 86972868        | 110.54         | 9614028103.29         | 5973589                    | 145.00                 | -2.68%                  | 0.00%          | 26.67%          | 26.67%           |
| 17-01-2022      | 3088424         | 147.93         | 456868341.20         | 1569325         | 147.72         | 231823769.40         | 111.82              | 175486151.84         | 88491967        | 111.82         | 9895410292.65         | 6154765                    | 147.90                 | 2.00%                   | 50.18%         | 25.50%          | 75.68%           |
| 18-01-2022      | 25220           | 143.04         | 3607450.00           | 1859076         | 146.69         | 272703284.80         | 111.83              | 207903424.55         | 86658111        | 111.83         | 9691114318.10         | 6558248                    | 144.10                 | -2.57%                  | 0.38%          | 28.35%          | 28.73%           |
| 19-01-2022      | 0               | 0.00           | 0.00                 | 2381135         | 150.28         | 357825861.30         | 111.83              | 266286112.47         | 84276976        | 111.83         | 9424828205.64         | 11945086                   | 151.70                 | 5.27%                   | 0.00%          | 19.93%          | 19.93%           |
| 20-01-2022      | 4615844         | 156.62         | 722911737.60         | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 88892820        | 114.16         | 10147739943.24        | 15778793                   | 160.40                 | 5.74%                   | 29.25%         | 0.00%           | 29.25%           |
| 23-01-2022      | 0               | 0.00           | 0.00                 | 1471264         | 160.00         | 235398587.60         | 114.16              | 167955122.36         | 87421556        | 114.16         | 9979784820.88         | 9767504                    | 158.20                 | -1.37%                  | 0.00%          | 15.06%          | 15.06%           |
| 24-01-2022      | 6500            | 152.00         | 988000.00            | 1174279         | 154.61         | 181557751.50         | 114.16              | 134055501.90         | 86253777        | 114.16         | 9846717318.98         | 6357015                    | 151.60                 | -4.17%                  | 0.10%          | 18.47%          | 18.57%           |
| 25-01-2022      | 2145851         | 153.87         | 330190297.90         | 2003597         | 153.43         | 307412557.70         | 115.12              | 230661848.15         | 86396031        | 115.12         | 9946245768.72         | 5690220                    | 153.10                 | 0.99%                   | 37.71%         | 35.21%          | 72.92%           |
| 26-01-2022      | 1781814         | 154.30         | 274929925.50         | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 88177845        | 115.92         | 10221175694.22        | 5401820                    | 152.90                 | -0.13%                  | 32.99%         | 0.00%           | 32.99%           |
| 27-01-2022      | 1181638         | 154.18         | 182182811.80         | 850075          | 153.98         | 130892988.70         | 116.42              | 98966944.36          | 88509408        | 116.42         | 10304391561.67        | 4028705                    | 153.50                 | 0.39%                   | 29.33%         | 21.10%          | 50.43%           |
| 30-01-2022      | 3285916         | 154.90         | 508988948.60         | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 91795324        | 117.80         | 10813380510.27        | 6777055                    | 154.20                 | 0.46%                   | 48.49%         | 0.00%           | 48.49%           |
| 31-01-2022      | 0               | 0.00           | 0.00                 | 769566          | 152.73         | 117535935.00         | 117.80              | 90653963.87          | 91025758        | 117.80         | 10722726546.39        | 4313387                    | 149.20                 | -3.24%                  | 0.00%          | 17.84%          | 17.84%           |
| 01-02-2022      | 1167022         | 150.43         | 175551202.10         | 800000          | 149.58         | 119660000.00         | 118.21              | 94569468.44          | 91392780        | 118.21         | 10803708280.05        | 6469737                    | 150.70                 | 1.01%                   | 18.04%         | 12.37%          | 30.40%           |
| 02-02-2022      | 0               | 0.00           | 0.00                 | 1822055         | 150.53         | 274272223.30         | 118.21              | 215388466.03         | 89570725        | 118.21         | 10588319814.02        | 6468690                    | 150.60                 | -0.07%                  | 0.00%          | 28.17%          | 28.17%           |
| 03-02-2022      | 0               | 0.00           | 0.00                 | 2971335         | 149.57         | 444411006.60         | 118.21              | 351246964.39         | 86599390        | 118.21         | 10237072849.63        | 5736483                    | 151.10                 | 0.33%                   | 0.00%          | 51.80%          | 51.80%           |
| 07-02-2022      | 1082281         | 150.24         | 162602423.60         | 1064237         | 149.92         | 159554858.30         | 118.61              | 126226143.82         | 86617434        | 118.61         | 10273449129.41        | 4394534                    | 148.90                 | -0.07%                  | 24.63%         | 24.22%          | 48.85%           |
| 10-02-2022      | 1116401         | 147.72         | 164915158.80         | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 87733835        | 118.98         | 10438364288.21        | 3296523                    | 147.20                 | -0.74%                  | 33.87%         | 0.00%           | 33.87%           |
| 13-02-2022      | 1825003         | 147.50         | 269189609.20         | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 89558838        | 119.56         | 10707553897.41        | 3398445                    | 147.10                 | -0.07%                  | 53.70%         | 0.00%           | 53.70%           |
| 17-02-2022      | 2632796         | 150.56         | 396394744.80         | 1911012         | 150.69         | 287969946.30         | 120.44              | 230170333.05         | 90280622        | 120.44         | 10873778309.16        | 7024967                    | 150.90                 | 0.07%                   | 37.48%         | 27.20%          | 64.68%           |
| 22-02-2022      | 0               | 0.00           | 0.00                 | 300000          | 147.60         | 44280332.50          | 120.44              | 36133263.38          | 89980622        | 120.44         | 10837645045.78        | 4419411                    | 147.70                 | -0.81%                  | 0.00%          | 6.79%           | 6.79%            |
| 24-02-2022      | 0               | 0.00           | 0.00                 | 708744          | 150.87         | 106928229.40         | 120.44              | 85364112.07          | 89271878        | 120.44         | 10752280933.71        | 5918978                    | 149.90                 | -0.53%                  | 0.00%          | 11.97%          | 11.97%           |
| 27-02-2022      | 1257250         | 148.18         | 186302424.50         | 995389          | 148.61         | 147923651.50         | 120.83              | 120272290.16         | 89533739        | 120.83         | 10818311068.06        | 3859352                    | 147.50                 | -1.60%                  | 32.58%         | 25.79%          | 58.37%           |
| 28-02-2022      | 579000          | 148.08         | 85704000.00          | 422090          | 147.87         | 62413391.10          | 120.26              | 51054601.46          | 89531649        | 120.31         | 10821450465.60        | 2764500                    | 147.60                 | 0.07%                   | 11.18%         | 10.71%          | 22.89%           |
| 01-03-2022      | 0               | 0.00           | 0.00                 | 50000           | 149.76         | 7487774.20           | 120.96              | 6047833.69           | 89481649        | 120.96         | 10823402631.91        | 7717890                    | 152.50                 | 3.32%                   | 0.00%          | 0.63%           | 0.63%            |
| 03-03-2022      | 0               | 0.00           | 0.00                 | 50000           | 152.50         | 7625000.00           | 120.96              | 6047833.69           | 89431649        | 120.96         | 10817354798.22        | 2443614                    | 152.40                 | -0.07%                  | 0.00%          | 2.05%           | 2.05%            |
| 06-03-2022      | 412275          | 152.39         | 62824947.00          | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 89843924        | 121.10         | 10880179745.22        | 4664805                    | 152.20                 | -0.13%                  | 8.84%          | 0.00%           | 8.84%            |
| 09-03-2022      | 300000          | 150.67         | 45200000.00          | 57650           | 149.54         | 8621175.00           | 121.20              | 6987139.17           | 90086274        | 121.20         | 10918392606.05        | 3078762                    | 150.00                 | 1.35%                   | 9.74%          | 1.87%           | 11.62%           |
| 10-03-2022      | 233352          | 151.87         | 35439218.40          | 0               | 0.00           | 0.00                 | 0.00                | 0.00                 | 90319626        | 121.28         | 10953831824.45        | 3293686                    | 152.00                 | 1.33%                   | 7.08%          | 0.00%           | 7.08%            |
| <b>Total</b>    | <b>28724654</b> | <b>151.94</b>  | <b>4364350613.90</b> | <b>42950901</b> | <b>151.67</b>  | <b>6514507443.30</b> | <b>113.29</b>       | <b>4865997982.70</b> | <b>90319626</b> | <b>121.28</b>  | <b>10953831824.45</b> |                            |                        |                         |                |                 |                  |



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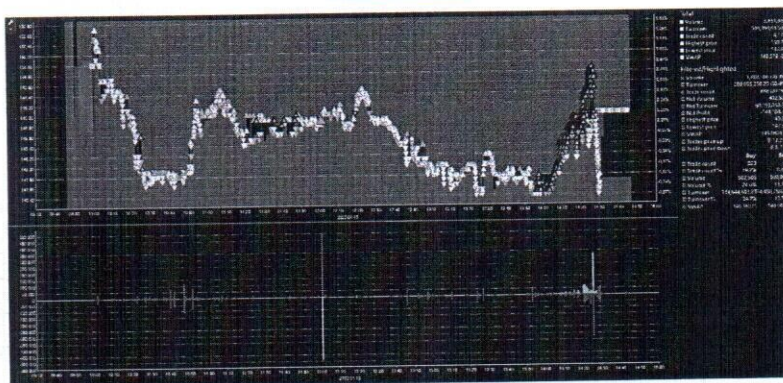
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## c) Trade monitoring screenshots of Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates (public market):

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. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates were observed which influenced to increase the liquidity of shares of "BEXIMCO" significantly during the investigation period which is delineated below:

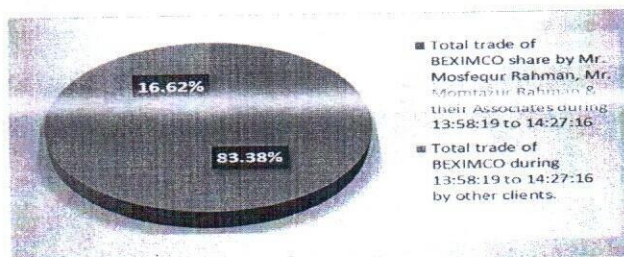
**BOID # 1605400046413474, 1201930019678794, 1605400019678794, 1201930019678719, 1203620069141133, 1605400019678719, 1605400069100429 and 1202550069100429 (combined)**

13.01.2022:



It was observed in the above graph that on 13-01-2022, total number of trades of BEXIMCO in the market was 4179, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 823 which is approximately 19.69% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 3,661,983 whereas buy volume by the said client(s) was 902,506 which is approximately 24.65% of the total traded volume in the market.

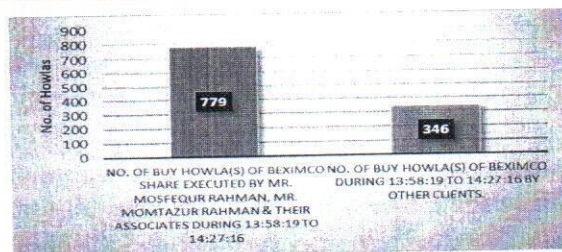
On 13-01-2022, trading of BEXIMCO share was started at Tk. 150.00 which is Tk. 1.30 more than the YCP of Tk. 148.70. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 13:58:19 at price Tk. 147.50 and induced the same to rise to Tk. 149.80 up to 14:27:16. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 13:58:19 to 14:27:16, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 886,840 shares of BEXIMCO compared to the total traded share of 1,063,621. This is shown in the following Pie Chart.





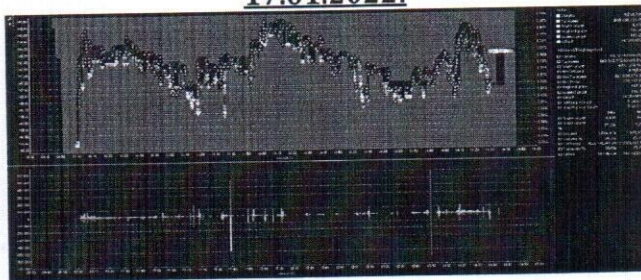
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It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 779 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 1,125 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 83.38% of the total trades of BEXIMCO shares by executing 779 of total 1,125 howlas from 13:58:19 to 14:27:16 on 13-01-2022. From 13:58:19 to 14:27:16, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 147.50 to Tk. 149.80. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

**17.01.2022:**

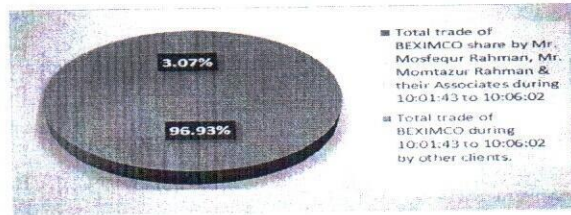


It was observed in the above graph that on 17-01-2022, total number of trades of BEXIMCO in the market was 6176, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 4403 which is approximately 71.29% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 6,098,765 whereas buy volume by the said client(s) was 3,068,424 which is approximately 50.31% of the total traded volume in the market. It is evident that the client had significant participation in the market on 17-01-2022 in trading of BEXIMCO share.

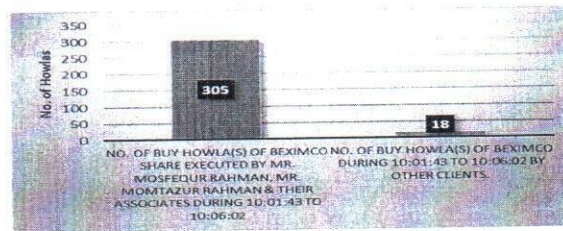
On 17-01-2022, trading of BEXIMCO share was started at Tk. 145.30 which is Tk. 0.30 more than the YCP of Tk. 145.00. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 10:01:43 at price Tk. 146.00 and induced the same to rise to Tk. 148.70 up to 10:06:02. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 10:01:43 to 10:06:02, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 271,066 shares of BEXIMCO compared to the total traded share of 279,664. This is shown in the following Pie Chart.



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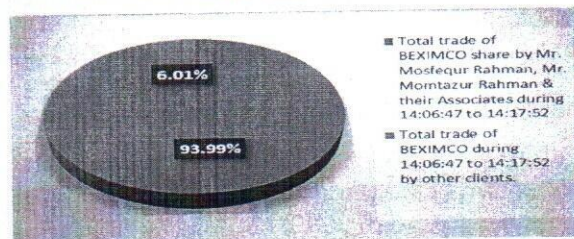


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 305 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 323 as shown in the following Bar Chart.

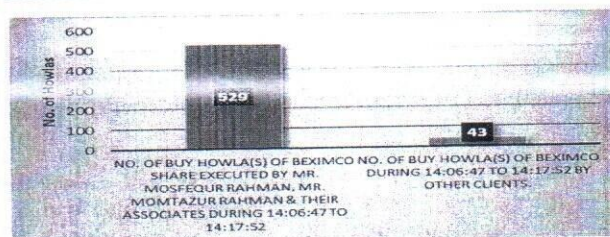


It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 96.93% of the total trades of BEXIMCO shares by executing 305 of total 323 howlas from 10:01:43 to 10:06:02 on 17-01-2022. From 10:01:43 to 10:06:02, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 146.00 to Tk. 148.70. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

Again, on that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 14:06:47 at price Tk. 146.70 and induced the same to rise to Tk. 148.70 up to 14:17:52. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 14:06:47 to 14:17:52, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 466,821 shares of BEXIMCO compared to the total traded share of 496,657. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 529 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 572 as shown in the following Bar Chart.





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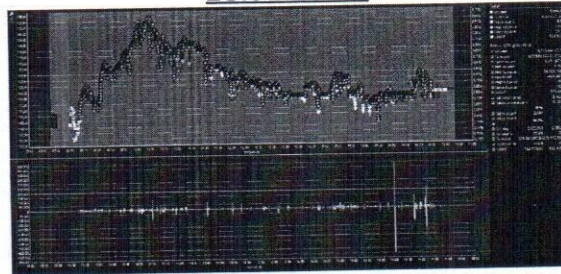
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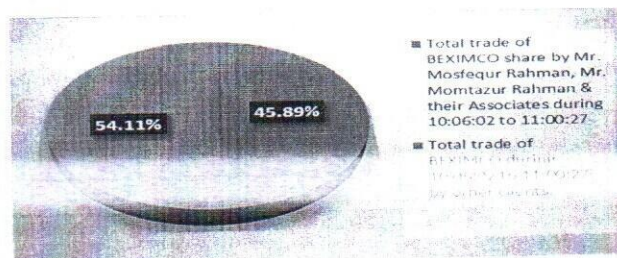
It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 93.99% of the total trades of BEXIMCO shares by executing 529 of total 572 howlas from 14:06:47 to 14:17:52 on 17-01-2022. From 14:06:47 to 14:17:52, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 146.70 to Tk. 148.70. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 2.90 which is approximately 2.00% higher than YCP.

**25.01.2022:**



It was observed in the above graph that on 25-01-2022, total number of trades of BEXIMCO in the market was 6549, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 3680 which is approximately 56.19% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 5,658,220 whereas buy volume by the said client(s) was 2,122,851 which is approximately 37.52% of the total traded volume in the market. It is evident that the client had significant participation in the market on 25-01-2022 in trading of BEXIMCO share.

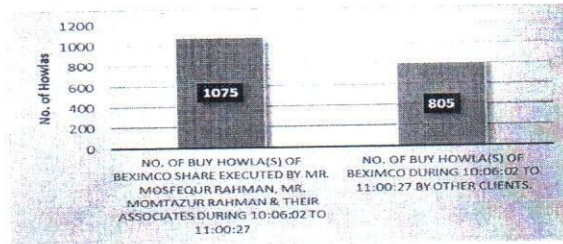
On 25-01-2022, trading of BEXIMCO share was started at Tk. 152.10 which is Tk. 0.50 more than the YCP of Tk. 151.60. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 10:06:02 at price Tk. 152.10 and induced the same to rise to Tk. 155.70 up to 11:00:27. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 10:06:02 to 11:00:27, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 536,652 shares of BEXIMCO compared to the total traded share of 1,169,465. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 1,075 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 1,880 as shown in the following Bar Chart.

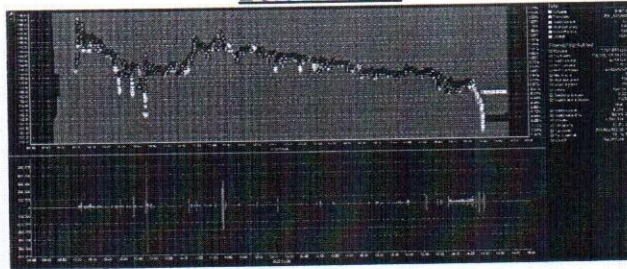


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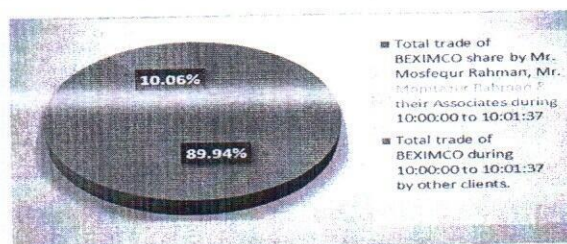
It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 45.89% of the total trades of BEXIMCO shares by executing 1,075 of total 1,880 howlas from 10:06:02 to 11:00:27 on 25-01-2022. From 10:06:02 to 11:00:27, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 152.10 to Tk. 155.70. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 1.50 which is approximately 0.99% higher than YCP.

**26.01.2022:**



It was observed in the above graph that on 26-01-2022, total number of trades of BEXIMCO in the market was 6231, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 3274 which is approximately 52.54% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 5,401,820 whereas buy volume by the said client(s) was 1,781,814 which is approximately 32.99% of the total traded volume in the market. It is evident that the client had significant participation in the market on 26-01-2022 in trading of BEXIMCO share.

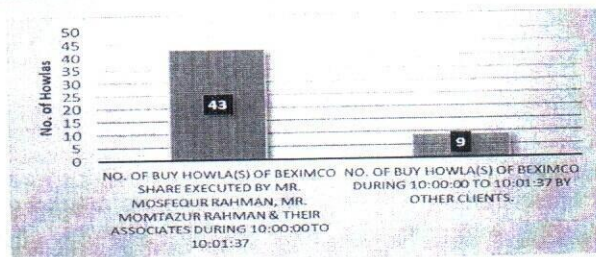
On 26-01-2022, trading of BEXIMCO share was started at Tk. 154.10 which is Tk. 1.00 more than the YCP of Tk. 153.10. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 10:00:00 at price Tk. 154.10 and induced the same to rise to Tk. 156.30 up to 10:01:37. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 10:00:00 to 10:01:37, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 30,429 shares of BEXIMCO compared to the total traded share of 33,834. This is shown in the following Pie Chart.





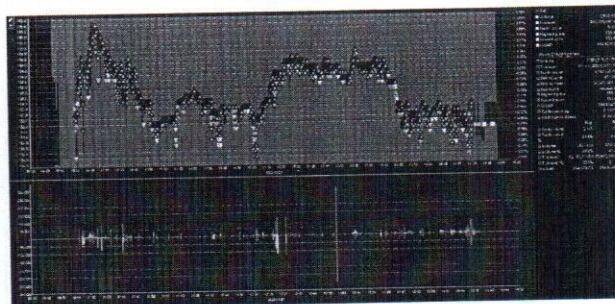
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It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 43 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 52 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 89.94% of the total trades of BEXIMCO shares by executing 43 of total 52 howlas from 10:00:00 to 10:01:37 on 26-01-2022. From 10:00:00 to 10:01:37, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 154.10 to Tk. 156.30. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

**27.01.2022:**



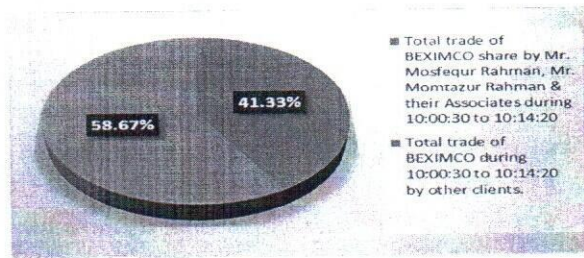
It was observed in the above graph that on 27-01-2022, total number of trades of BEXIMCO in the market was 5725, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 3145 which is approximately 54.93% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 3,966,705 whereas buy volume by the said client(s) was 1,181,638 which is approximately 29.79% of the total traded volume in the market.

On 27-01-2022, trading of BEXIMCO share was started at Tk. 153.90 which is Tk. 1.00 more than the YCP of Tk. 152.90. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 10:00:30 at price Tk. 153.50 and induced the same to rise to Tk. 155.40 up to 10:14:20. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 10:00:30 to 10:14:20, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 182,443 shares of BEXIMCO compared to the total traded share of 441,380. This is shown in the following Pie Chart.

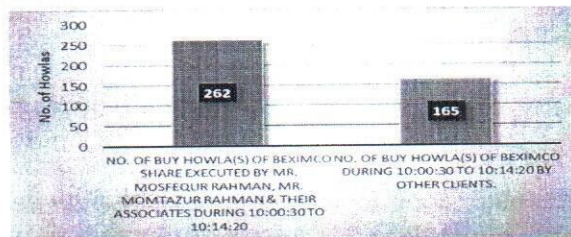
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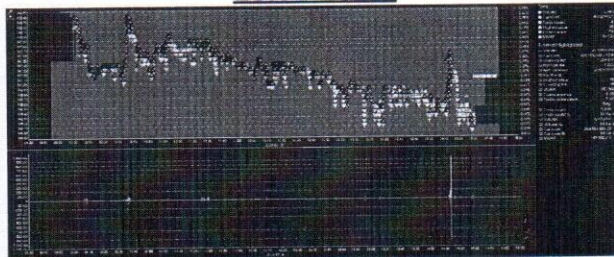


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 262 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 427 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 41.33% of the total trades of BEXIMCO shares by executing 262 of total 427 howlas from 10:00:30 to 10:14:20 on 27-01-2022. From 10:00:30 to 10:14:20, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 153.50 to Tk. 155.40. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

**13.02.2022:**



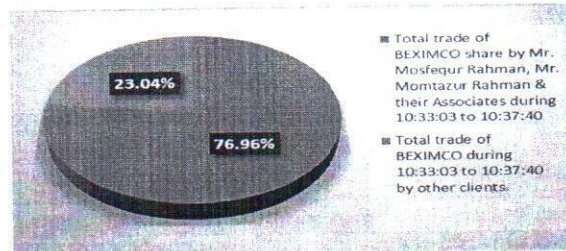
It was observed in the above graph that on 13-02-2022, total number of trades of BEXIMCO in the market was 3888, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 1284 which is approximately 33.02% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 3,341,445 whereas buy volume by the said client(s) was 1,825,003 which is approximately 54.62% of the total traded volume in the market. It is evident that the client had significant participation in the market on 13-02-2022 in trading of BEXIMCO share.

On 13-02-2022, trading of BEXIMCO share was started at Tk. 148.40 which is Tk. 1.20 more than the YCP of Tk. 147.20. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 10:33:03 at price Tk. 147.10 and induced the same to rise to Tk. 148.40 up to 10:37:40. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 10:33:03 to 10:37:40, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 172,032 shares of

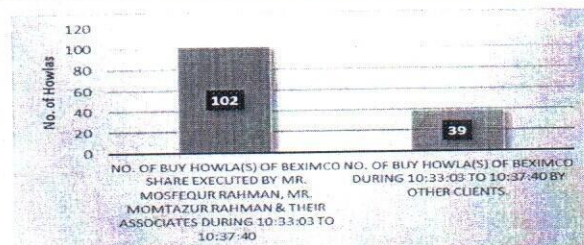


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BEXIMCO compared to the total traded share of 223,524. This is shown in the following Pie Chart.

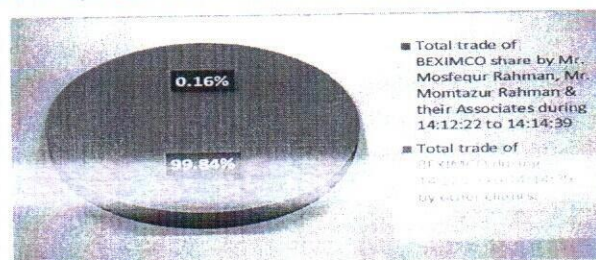


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 102 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 141 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 76.96% of the total trades of BEXIMCO shares by executing 102 of total 141 howlas from 10:33:03 to 10:37:40 on 13-02-2022. From 10:33:03 to 10:37:40, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 147.10 to Tk. 148.40. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

Again, on that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 14:12:22 at price Tk. 146.40 and induced the same to rise to Tk. 147.60 up to 14:14:39. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 14:12:22 to 14:14:39, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 1,160,812 shares of BEXIMCO compared to the total traded share of 1,162,669. This is shown in the following Pie Chart.

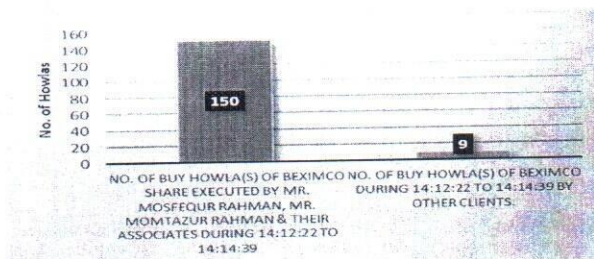


It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 150 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 159 as shown in the following Bar Chart.

*[Signature]*

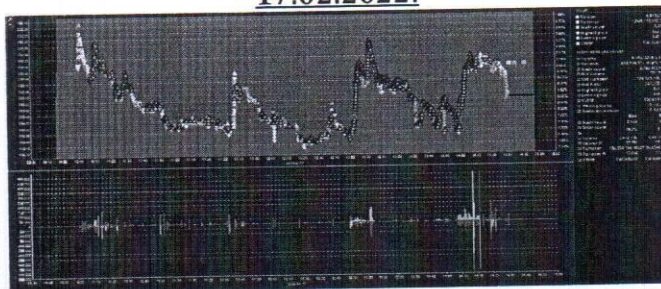


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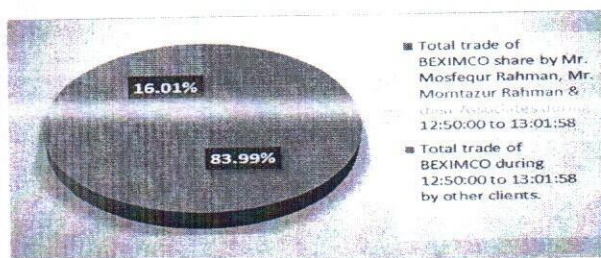
It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 99.84% of the total trades of BEXIMCO shares by executing 150 of total 159 howlas from 14:12:22 to 14:14:39 on 13-02-2022. From 14:12:22 to 14:14:39, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 146.40 to Tk. 147.60. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

**17.02.2022:**



It was observed in the above graph that on 17-02-2022, total number of trades of BEXIMCO in the market was 6467, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 2532 which is approximately 39.15% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 6,978,817 whereas buy volume by the said client(s) was 2,632,796 which is approximately 37.73% of the total traded volume in the market. It is evident that the client had significant participation in the market on 17-02-2022 in trading of BEXIMCO share.

On 17-02-2022, trading of BEXIMCO share was started at Tk. 151.00 which is Tk. 0.20 more than the YCP of Tk. 150.80. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 12:50:00 at price Tk. 148.70 and induced the same to rise to Tk. 151.70 up to 13:01:58. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 12:50:00 to 13:01:58, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 456,579 shares of BEXIMCO compared to the total traded share of 543,588. This is shown in the following Pie Chart.



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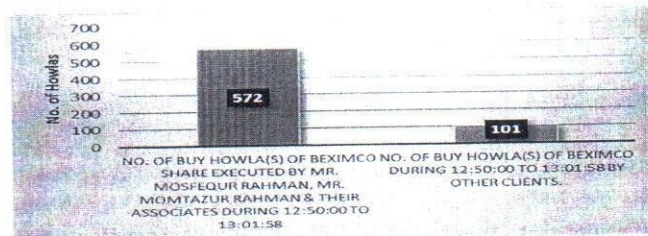
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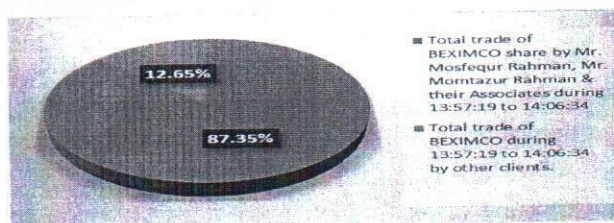
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It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 572 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 673 as shown in the following Bar Chart.

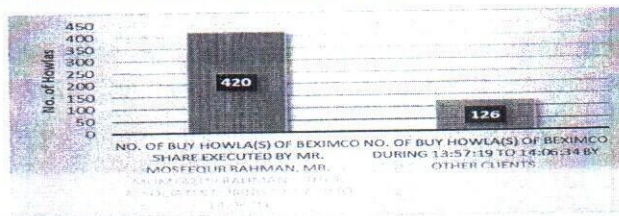


It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 83.99% of the total trades of BEXIMCO shares by executing 572 of total 673 howlas from 12:50:00 to 13:01:58 on 17-02-2022. From 12:50:00 to 13:01:58, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 148.70 to Tk. 151.70. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

Again, on that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 13:57:19 at price Tk. 148.80 and induced the same to rise to Tk. 151.20 up to 14:06:34. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 13:57:19 to 14:06:34, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 619,642 shares of BEXIMCO compared to the total traded share of 709,388. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 420 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 546 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 87.35% of the total trades of BEXIMCO shares by executing 420 of total 546 howlas from 13:57:19 to 14:06:34 on 17-02-2022. From 13:57:19 to 14:06:34, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 148.80 to Tk. 151.20. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.



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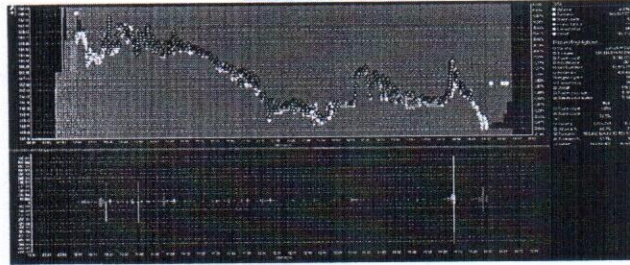
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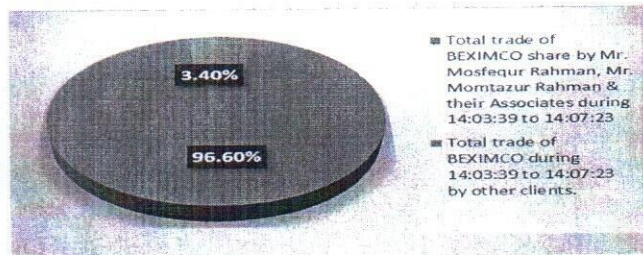
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**27.02.2022:**

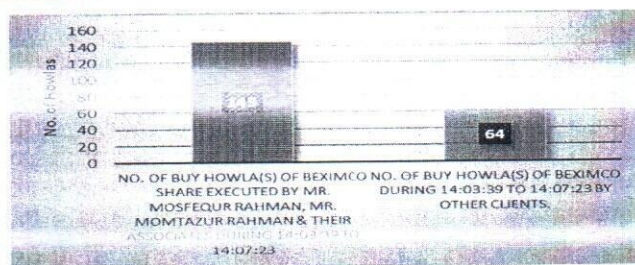


It was observed in the above graph that on 27-02-2022, total number of trades of BEXIMCO in the market was 5048, whereas number of trades (buy) executed by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were 1690 which is approximately 33.48% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 3,849,352 whereas buy volume by the said client(s) was 1,257,250 which is approximately 32.66% of the total traded volume in the market. It is evident that the client had significant participation in the market on 27-02-2022 in trading of BEXIMCO share.

On 27-02-2022, trading of BEXIMCO share was started at Tk. 150.00 which is Tk. 0.10 more than the YCP of Tk. 149.90. On that day, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates started series of trading at 14:03:39 at price Tk. 147.00 and induced the same to rise to Tk. 148.30 up to 14:07:23. It can also be observed from the above graph that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed significant trades during this time period. It is mentionable here that from 14:03:39 to 14:07:23, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 277,512 shares of BEXIMCO compared to the total traded share of 287,267. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates executed 145 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 209 as shown in the following Bar Chart.





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It is observed from the above graphs and screenshot that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 96.60% of the total trades of BEXIMCO shares by executing 145 of total 209 howlas from 14:03:39 to 14:07:23 on 27-02-2022. From 14:03:39 to 14:07:23, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates induced the price to rise from Tk. 147.00 to Tk. 148.30. Thus it seems that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates were actively trying to lift the price of BEXIMCO share.

## d). Gain and Loss by Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates from 02.01.2022 to 10.03.2022:

| Summary   |                |             |            |                |            |           |                |               |            |                |               |                     |               |                |                |                |
|-----------|----------------|-------------|------------|----------------|------------|-----------|----------------|---------------|------------|----------------|---------------|---------------------|---------------|----------------|----------------|----------------|
| Block Buy |                |             | Block Sale |                |            | Total Buy |                |               | Total Sale |                |               | Cost of Shares Sold |               | Stock Position |                |                |
| Qty       | Price (W.Avg.) | Amount      | Qty        | Price (W.Avg.) | Amount     | Qty       | Price (W.Avg.) | Amount        | Qty        | Price (W.Avg.) | Amount        | Price (W.Avg.)      | Amount        | Qty            | Price (W.Avg.) | Amount         |
| 206000    | 156.79         | 32298100.00 | 47000      | 134.47         | 6320000.00 | 28724654  | 151.94         | 4364350613.90 | 42950901   | 151.67         | 6514507443.30 | 113.29              | 4865997982.70 | 90319626       | 121.28         | 10953831824.45 |

|                                     |               |                                                                            |
|-------------------------------------|---------------|----------------------------------------------------------------------------|
| Realized Capital gain(loss)per unit | 38.38         | Average Sale Price - Average Cost Price                                    |
| Realized Capital gain(loss)%        | 33.88%        | Gain (loss) Per Unit/Cost Per Unit                                         |
| Realized Capital gain(loss)TK       | 1648509460.60 | Total Sale Quantity x Gain (loss) Per Unit                                 |
| Closing Price (10-03-2022)          | 152.00        | Closing Price of Last Investigation Date                                   |
| Unrealized gain(loss) per unit      | 30.72         | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) %             | 25.33%        | Unrealized gain (loss) per unit /Average Price of Stock Position           |
| Unrealized gain(loss) TK            | 2774751327.55 | Quantity of Stock Positon x Unrealized gain (loss) per unit                |

As per DSE trade data, it was observed that Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates bought 28,724,654 shares and sold 42,950,901 shares of "BEXIMCO" from both public and block market during the period from 02.01.2022 to 10.03.2022. With these BO accounts, Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates traded 24.61% shares of "BEXIMCO" during the investigation period and realized a capital gain of Tk. 1,648,509,460.60 from the trading of shares of "BEXIMCO" during the investigation period. It is also mentionable that they had significant amount of unrealized gain of Tk. 2,774,751,327.55

### 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 an 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;"





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It is evident that **Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates** were involved directly and indirectly in a series of transactions of shares of 'BEXIMCO' with his aforesaid BO account in order to create an appearance of active trading and raising of price of the shares of the aforesaid company.

## Contravention - 1:

**Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their 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 "BEXIMCO" creating an appearance of active trading therein and raising price of the said share.

## Observation - 2:

After analyzing the trade pattern of the clients, the investigation team found that Mosfequr Rahman (Client code # **dhn8733** of Beximco Securities Limited), Jupitar Business (Client code # **J3504** of ICB Securities Trading Company Limited), Mosfequr Rahman (Client code # **J3461** of ICB Securities Trading Company Limited), Mosfequr Rahman (Client code # **CTG1994** of Green Delta Securities Limited), Momtazur Rahman (Client code # **J3463** of ICB Securities Trading Company Limited), Apollo Trading Limited (Client code # **J3505** of ICB Securities Trading Company Limited) were involved in trading in shares of "BEXIMCO" within the investigation period and these accounts are acting as counter party of each other for 1,846,224 shares of "BEXIMCO" in the public market.

**Details of all the above mentioned trades are as follows:**

| INSTRUMENT CODE | TRADE VOLUME | BUYER CODE | BUYER CLIENT | BOID BUYER       | BUYER NAME             | SELLER CODE | SELLER CLIENT | BOID SELLER      | SELLER NAME            | MARKET TYPE |
|-----------------|--------------|------------|--------------|------------------|------------------------|-------------|---------------|------------------|------------------------|-------------|
| BEXIMCO         | 250545       | DSEIST     | J3504        | 1605400046413474 | JUPITAR BUSINESS LTD.  | DSEBEX      | dhn8733       | 1201930019678794 | MOSFEQUR RAHMAN        | Public      |
|                 | 57681        |            |              |                  |                        | DSEIST      | J3461         | 1605400019678794 | MOSFEQUR RAHMAN        | Public      |
|                 | 63139        |            |              |                  |                        | DSEGDF      | CTG1994       | 1203620069141133 | Mosfequr Rahman        | Public      |
|                 | 982412       |            |              |                  |                        | DSEIST      | J3505         | 1605400069100429 | APOLLO TRADING LIMITED | Public      |
| BEXIMCO         | 19252        | DSEIST     | J3463        | 1605400019678719 | MOMTAZUR RAHMAN        | DSEBEX      | dhn8733       | 1201930019678794 | MOSFEQUR RAHMAN        | Public      |
| BEXIMCO         | 452736       | DSEIST     | J3505        | 1605400069100429 | APOLLO TRADING LIMITED | DSEIST      | J3504         | 1605400046413474 | JUPITAR BUSINESS LTD.  | Public      |
|                 | 20459        |            |              |                  |                        | DSEIST      | J3463         | 1605400019678719 | MOMTAZUR RAHMAN        | Public      |

(Source: DSE Trade data)

## Findings - 2:

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

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

(ii) create a false and misleading appearance of active trading in any securities; ....."



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It is found that Mosfequr Rahman, Jupiter Business, Momtazur Rahman and Apollo Trading Limited through the aforesaid clients' accounts acted as counter party of each other for 1,846,224 shares of "BEXIMCO" during the investigation period.

## Contravention(s) - 2:

**Mosfequr Rahman, Jupiter Business, Momtazur Rahman and Apollo Trading Limited** have violated the following:

- Section 17(e)(ii) of Securities and Exchange Ordinance, 1969 by executing trades that created a false and misleading appearance of active trading in securities.

## Observation - 3:

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

|                                     |                  |                  |                |                       | 02-01-22    |            | 03-01-2022 |            | 04-01-2022 |            | 05-01-2022 |            | 06-01-2022 |            | 09-01-2022 |            | 10-01-2022 |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | Total Qty   | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 21923994    | 2.50%      | 16591442   | 1.89%      | 16591442   | 1.89%      | 16591442   | 1.89%      | 16591442   | 1.89%      | 16591442   | 1.89%      | 16591442   | 1.89%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities Li | 13637791    | 1.56%      | 12837791   | 1.46%      | 12837791   | 1.46%      | 12837791   | 1.46%      | 12337791   | 1.41%      | 11845291   | 1.35%      | 10845291   | 1.24%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 15893743    | 1.81%      | 15893743   | 1.81%      | 15893743   | 1.81%      | 15893743   | 1.81%      | 15893743   | 1.81%      | 12252576   | 1.40%      | 12252576   | 1.40%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities Li | 4278284     | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      |
| 5                                   | Mosfequr Rahman  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 186400      | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 17994681    | 2.05%      | 17994681   | 2.05%      | 17994681   | 2.05%      | 17994681   | 2.05%      | 17994681   | 2.05%      | 17994681   | 2.05%      | 18155725   | 2.07%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 30205807    | 3.45%      | 30205807   | 3.45%      | 27717741   | 3.16%      | 27717741   | 3.16%      | 27717741   | 3.16%      | 27717741   | 3.16%      | 27717741   | 3.16%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      |
| Total                               |                  |                  |                |                       | 104120700   | 11.88%     | 97988148   | 11.18%     | 95500082   | 10.90%     | 95500082   | 10.90%     | 95000082   | 10.84%     | 90866415   | 10.37%     | 90027459   | 10.27%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |            |            |            |            |            |            |            |            |            |            |            |            |

|                                     |                  |                  |                |                       | 11-01-2022  |            | 12-01-2022 |            | 13-01-2022 |            | 17-01-2022 |            | 20-01-2022 |            | 26-01-2022 |            | 27-01-2022 |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | Total Qty   | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 16591442    | 1.89%      | 16591442   | 1.89%      | 17493947   | 2.00%      | 20582371   | 2.35%      | 18718736   | 2.14%      | 20780814   | 2.37%      | 20780814   | 2.37%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities Li | 9559899     | 1.09%      | 7971205    | 0.91%      | 7471205    | 0.85%      | 5281647    | 0.60%      | 4080523    | 0.47%      | 3080521    | 0.35%      | 3080521    | 0.35%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 15893743    | 1.81%      | 12252576   | 1.40%      | 12252576   | 1.40%      | 12252576   | 1.40%      | 12252576   | 1.40%      | 12252576   | 1.40%      | 12252576   | 1.40%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities Li | 4278284     | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 4278284    | 0.49%      | 3785784    | 0.43%      | 3285784    | 0.37%      | 3285784    | 0.37%      |
| 5                                   | Mosfequr Rahman  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 186400      | 0.02%      | 186400     | 0.02%      | 186400     | 0.02%      | 112900     | 0.01%      | 112900     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 18394606    | 2.10%      | 19165676   | 2.19%      | 19165677   | 2.19%      | 19165677   | 2.19%      | 18507945   | 2.11%      | 20289759   | 2.32%      | 19439906   | 2.22%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 27717741    | 3.16%      | 27717741   | 3.16%      | 27717741   | 3.16%      | 26818512   | 3.06%      | 26818512   | 3.06%      | 26366750   | 3.01%      | 27547466   | 3.14%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      |
| Total                               |                  |                  |                |                       | 88970948    | 10.15%     | 88163324   | 10.06%     | 88568830   | 10.11%     | 88491967   | 10.10%     | 88892820   | 10.14%     | 88177845   | 10.06%     | 88509408   | 10.10%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |            |            |            |            |            |            |            |            |            |            |            |            |



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| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | 30-01-2022  |            | 31-01-2022 |            | 01-02-2022 |            | 02-02-2022 |            | 10-02-2022 |            | 13-02-2022 |            | 14-02-2022 |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
|                                     |                  |                  |                |                       | Total Qty   | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 20780814    | 2.37%      | 20780814   | 2.37%      | 21947836   | 2.50%      | 21947836   | 2.50%      | 20758782   | 2.37%      | 22583785   | 2.58%      | 22583785   | 2.58%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities L  | 3080521     | 0.35%      | 3080521    | 0.35%      | 2280521    | 0.26%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 14274317    | 1.63%      | 14274317   | 1.63%      | 14274317   | 1.63%      | 14274317   | 1.63%      | 15390718   | 1.76%      | 15390718   | 1.76%      | 15390718   | 1.76%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities L  | 3285784     | 0.37%      | 3285784    | 0.37%      | 3285784    | 0.37%      | 3285784    | 0.37%      | 2485784    | 0.28%      | 2485784    | 0.28%      | 2485784    | 0.28%      |
| 5                                   | Mosfequr Rahmar  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 100400      | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 19439906    | 2.22%      | 19439906   | 2.22%      | 19439906   | 2.22%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 30833582    | 3.52%      | 30064016   | 3.43%      | 30064016   | 3.43%      | 30064016   | 3.43%      | 29099779   | 3.32%      | 29099779   | 3.32%      | 29099779   | 3.32%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      |
| Total                               |                  |                  |                |                       | 91795324    | 10.48%     | 91025758   | 10.39%     | 91392780   | 10.43%     | 89570725   | 10.22%     | 87733835   | 10.01%     | 89558838   | 10.22%     | 89558838   | 10.22%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |            |            |            |            |            |            |            |            |            |            |            |            |

| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | 15-02-2022  |            | 16-02-2022 |            | 17-02-2022 |            | 20-02-2022 |            | 22-02-2022 |            | 23-02-2022 |            | 24-02-2022 |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
|                                     |                  |                  |                |                       | Total Qty   | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 22583785    | 2.58%      | 22583785   | 2.58%      | 20675502   | 2.36%      | 20675502   | 2.36%      | 20675502   | 2.36%      | 20675502   | 2.36%      | 20675502   | 2.36%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities L  | 1780521     | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1780521    | 0.20%      | 1770521    | 0.20%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 15390718    | 1.76%      | 15390718   | 1.76%      | 15390718   | 1.76%      | 15390718   | 1.76%      | 15390718   | 1.76%      | 15390718   | 1.76%      | 14691974   | 1.68%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities L  | 2485784     | 0.28%      | 2485784    | 0.28%      | 2485784    | 0.28%      | 2485784    | 0.28%      | 2185784    | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      |
| 5                                   | Mosfequr Rahmar  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 100400      | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      | 100400     | 0.01%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 18117851    | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 29099779    | 3.32%      | 29099779   | 3.32%      | 31729846   | 3.62%      | 31729846   | 3.62%      | 31729846   | 3.62%      | 31729846   | 3.62%      | 31729846   | 3.62%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      |
| Total                               |                  |                  |                |                       | 89558838    | 10.22%     | 89558838   | 10.22%     | 90280622   | 10.30%     | 90280622   | 10.30%     | 89980622   | 10.27%     | 89980622   | 10.27%     | 89271878   | 10.19%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |            |            |            |            |            |            |            |            |            |            |            |            |

| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | 27-02-2022  |            | 28-02-2022 |            | 01-03-2022 |            | 02-03-2022 |            | 03-03-2022 |            | 06-03-2022 |            | 07-03-2022 |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
|                                     |                  |                  |                |                       | Total Qty   | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage | Total Qty  | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 21932752    | 2.50%      | 22352752   | 2.55%      | 22352752   | 2.55%      | 22352752   | 2.55%      | 22352752   | 2.55%      | 22352752   | 2.55%      | 22352752   | 2.55%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities L  | 1770521     | 0.20%      | 1348431    | 0.15%      | 1348431    | 0.15%      | 1348431    | 0.15%      | 1298431    | 0.15%      | 1298431    | 0.15%      | 1298431    | 0.15%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 14691974    | 1.68%      | 14691974   | 1.68%      | 14691974   | 1.68%      | 14691974   | 1.68%      | 14691974   | 1.68%      | 14691974   | 1.68%      | 14691974   | 1.68%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities L  | 2185784     | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      | 2185784    | 0.25%      |
| 5                                   | Mosfequr Rahmar  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 100400      | 0.01%      | 100400     | 0.01%      | 50400      | 0.01%      | 50400      | 0.01%      | 50400      | 0.01%      | 50400      | 0.01%      | 50400      | 0.01%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 18117851    | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      | 18117851   | 2.07%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 30734457    | 3.51%      | 30734457   | 3.51%      | 30734457   | 3.51%      | 30734457   | 3.51%      | 30734457   | 3.51%      | 31146732   | 3.55%      | 31146732   | 3.55%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      | 0          | 0.00%      |
| Total                               |                  |                  |                |                       | 89533739    | 10.22%     | 89531649   | 10.22%     | 89481649   | 10.21%     | 89481649   | 10.21%     | 89431649   | 10.21%     | 89843924   | 10.25%     | 89843924   | 10.25%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |            |            |            |            |            |            |            |            |            |            |            |            |

| Sl. No                              | Client Name      | BO ID            | Client Code    | Name of TREC Holder   | 08-03-2022  |            | 09-03-22  |            | 10-03-22  |            |
|-------------------------------------|------------------|------------------|----------------|-----------------------|-------------|------------|-----------|------------|-----------|------------|
|                                     |                  |                  |                |                       | Total Qty   | Percentage | Total Qty | Percentage | Total Qty | Percentage |
| 1                                   | JUPITAR BUSINESS | 1605400046413474 | Code # J3504   | Janata Capital and In | 22352752    | 2.55%      | 22352752  | 2.55%      | 22352752  | 2.55%      |
| 2                                   | MOSFEQUR RAHM    | 1201930019678794 | Code # dhn8733 | Beximco Securities L  | 1298431     | 0.15%      | 1240781   | 0.14%      | 1240781   | 0.14%      |
| 3                                   | MOSFEQUR RAHM    | 1605400019678794 | Code # J3461   | Janata Capital and In | 14691974    | 1.68%      | 14691974  | 1.71%      | 14691974  | 1.71%      |
| 4                                   | MOMTAZUR RAHM    | 1201930019678719 | Code # dhn8732 | Beximco Securities L  | 2185784     | 0.25%      | 2185784   | 0.23%      | 2185784   | 0.23%      |
| 5                                   | Mosfequr Rahmar  | 1203620069141133 | Code # CTG1994 | Green Delta Securitie | 50400       | 0.01%      | 50400     | 0.01%      | 50400     | 0.01%      |
| 6                                   | MOMTAZUR RAHM    | 1605400019678719 | Code # J3463   | Janata Capital and In | 18117851    | 2.07%      | 18117851  | 2.07%      | 18117851  | 2.07%      |
| 7                                   | APOLLO TRADING   | 1605400069100429 | Code # J3505   | Janata Capital and In | 31146732    | 3.55%      | 31146732  | 3.55%      | 31146732  | 3.55%      |
| 8                                   | APOLLO TRADING   | 1202550069100429 | Code # C262    | Sheltech Brokerage L  | 0           | 0.00%      | 0         | 0.00%      | 233352    | 0.03%      |
| Total                               |                  |                  |                |                       | 89843924    | 10.25%     | 90086274  | 10.28%     | 90319626  | 10.31%     |
| Total No. of Outstanding Securities |                  |                  |                |                       | 876,318,879 |            |           |            |           |            |



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From the above table, it is observed that **Mr. Mosfequr Rahman, Mr. Momtazur Rahman & their Associates** jointly hold more than 10% shares of the total paid up shares of "BEXIMCO" which violates বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ since there was no declaration to buy more than 10% shares of the above instruments.

### Findings - 3:

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 (person acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে রূপান্তরযোগ্য সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন্য প্রস্তাব করে ....."

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

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

It is found that **Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates** jointly hold more than 10% shares of 'BEXIMCO' on 10-03-2022. Through the aforesaid activities, it appears that **Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates** violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

### Contravention - 3:

**Mr. Mosfequr Rahman, Mr. Momtazur Rahman and their Associates** have violated the following:

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





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## INDIVIDUAL TRADE PATTERN OF MR. MOMTAZUR RAHMAN.

### a) Individual Trade Patterns of Momtazur Rahman (Only Public Market):

| Date       | Code #dhn8732              |               |           |               | Code #J3463                           |               |           |               | Total   |                   |              |           |                    |              |
|------------|----------------------------|---------------|-----------|---------------|---------------------------------------|---------------|-----------|---------------|---------|-------------------|--------------|-----------|--------------------|--------------|
|            | BOID # 1201930019678719    |               |           |               | BOID # 1605400019678719               |               |           |               |         |                   |              |           |                    |              |
|            | MOMTAZUR RAHMAN            |               |           |               | MOMTAZUR RAHMAN                       |               |           |               |         |                   |              |           |                    |              |
|            | Beximco Securities Limited |               |           |               | Janata Capital and Investment 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        |
| 02-01-2022 | 0                          | 0.00          | 0         | 0.00          | 73566                                 | 152.79        | 0         | 0.00          | 73566   | 152.79            | 11240426.70  | 0         | 0.00               | 0.00         |
| 10-01-2022 | 0                          | 0.00          | 0         | 0.00          | 147044                                | 148.80        | 0         | 0.00          | 147044  | 148.80            | 21879947.30  | 0         | 0.00               | 0.00         |
| 11-01-2022 | 0                          | 0.00          | 0         | 0.00          | 228881                                | 152.08        | 0         | 0.00          | 228881  | 152.08            | 34808030.00  | 0         | 0.00               | 0.00         |
| 12-01-2022 | 0                          | 0.00          | 0         | 0.00          | 768070                                | 151.18        | 0         | 0.00          | 768070  | 151.18            | 116113260.70 | 0         | 0.00               | 0.00         |
| 13-01-2022 | 0                          | 0.00          | 0         | 0.00          | 1                                     | 148.90        | 0         | 0.00          | 1       | 148.90            | 148.90       | 0         | 0.00               | 0.00         |
| 18-01-2022 | 0                          | 0.00          | 0         | 0.00          | 220                                   | 147.50        | 645952    | 145.89        | 220     | 147.50            | 32450.00     | 645952    | 145.89             | 94235281.40  |
| 19-01-2022 | 0                          | 0.00          | 492500    | 150.90        | 0                                     | 0.00          | 0         | 0.00          | 0       | 0.00              | 0.00         | 492500    | 150.90             | 74318250.00  |
| 25-01-2022 | 0                          | 0.00          | 500000    | 152.90        | 0                                     | 0.00          | 0         | 0.00          | 0       | 0.00              | 0.00         | 500000    | 152.90             | 76450000.00  |
| 26-01-2022 | 0                          | 0.00          | 0         | 0.00          | 1781814                               | 154.30        | 0         | 0.00          | 1781814 | 154.30            | 274929925.50 | 0         | 0.00               | 0.00         |
| 27-01-2022 | 0                          | 0.00          | 0         | 0.00          | 222                                   | 153.20        | 840075    | 154.14        | 222     | 153.20            | 34010.40     | 840075    | 154.14             | 129492988.70 |
| 02-02-2022 | 0                          | 0.00          | 0         | 0.00          | 0                                     | 0.00          | 1322055   | 150.82        | 0       | 0.00              | 0.00         | 1322055   | 150.82             | 199390204.60 |
| 03-02-2022 | 0                          | 0.00          | 800000    | 148.70        | 0                                     | 0.00          | 0         | 0.00          | 0       | 0.00              | 0.00         | 800000    | 148.70             | 118960000.00 |
| 22-02-2022 | 0                          | 0.00          | 300000    | 147.60        | 0                                     | 0.00          | 0         | 0.00          | 0       | 0.00              | 0.00         | 300000    | 147.60             | 44280332.50  |
| Total      | 0                          |               | 2092500   |               | 2999818                               |               | 2808082   |               | 2999818 |                   |              | 4900582   |                    |              |

### b) Effects of "BEXIMCO" at DSE (both Public Market and Block Market) by Momtazur Rahman:

| Date            | Buy     |                |              | Sale    |                |              | Bonus Share Credited | Cost of shares sold |              | Stock Position |                |               | Comparison with the Market |                        |                         |                |                 |                  |
|-----------------|---------|----------------|--------------|---------|----------------|--------------|----------------------|---------------------|--------------|----------------|----------------|---------------|----------------------------|------------------------|-------------------------|----------------|-----------------|------------------|
|                 | Qty.    | Price (W.Avg.) | Amount       | Qty.    | Price (W.Avg.) | Amount       |                      | Price (W.Avg.)      | Amount       | Qty.           | Price (W.Avg.) | Amount        | Mkt Trade Qty at DSE       | Mkt Close Price at DSE | Market price Changed by | Client Buy (%) | Client Sale (%) | Client Trade (%) |
| Opening Balance |         |                |              |         |                |              |                      |                     |              | 22199399       | 103.00         | 2286595605.13 |                            |                        |                         |                |                 |                  |
| 02-01-2022      | 73566   | 152.79         | 11240426.70  | 0       | 0.00           | 0.00         | 0                    | 0.00                | 0.00         | 22272965       | 103.17         | 2297836031.83 | 6504974                    | 154.10                 | 3.84%                   | 1.13%          | 0.00%           | 1.13%            |
| 10-01-2022      | 161044  | 149.76         | 24118047.30  | 0       | 0.00           | 0.00         | 0                    | 0.00                | 0.00         | 22434009       | 103.50         | 2321954079.13 | 6416627                    | 151.40                 | 2.92%                   | 2.51%          | 0.00%           | 2.51%            |
| 11-01-2022      | 228881  | 152.08         | 34808030.00  | 0       | 0.00           | 0.00         | 0                    | 0.00                | 0.00         | 22662890       | 103.99         | 2356762109.13 | 8014173                    | 151.60                 | 0.13%                   | 2.86%          | 0.00%           | 2.86%            |
| 12-01-2022      | 781070  | 151.41         | 118258260.70 | 0       | 0.00           | 0.00         | 0                    | 0.00                | 0.00         | 23443960       | 105.57         | 2475020369.83 | 6550719                    | 148.70                 | -1.91%                  | 11.92%         | 0.00%           | 11.92%           |
| 18-01-2022      | 220     | 147.50         | 32450.00     | 657952  | 145.69         | 95855281.40  | 0                    | 105.57              | 69461417.78  | 22786229       | 105.57         | 2405591550.95 | 6558248                    | 144.10                 | -2.57%                  | 0.00%          | 10.03%          | 10.04%           |
| 19-01-2022      | 0       | 0.00           | 0.00         | 492500  | 150.90         | 74318250.00  | 0                    | 105.57              | 51994291.76  | 22293729       | 105.57         | 2353597259.19 | 11945086                   | 151.70                 | 5.27%                   | 0.00%          | 4.12%           | 4.12%            |
| 25-01-2022      | 0       | 0.00           | 0.00         | 500000  | 152.90         | 76450000.00  | 0                    | 105.57              | 52786083.01  | 21793729       | 105.57         | 2300811176.18 | 5690220                    | 153.10                 | 0.99%                   | 0.00%          | 8.79%           | 8.79%            |
| 26-01-2022      | 1781814 | 154.30         | 274929925.50 | 0       | 0.00           | 0.00         | 0                    | 0.00                | 0.00         | 23575543       | 109.25         | 2575741101.68 | 5401820                    | 152.90                 | -0.13%                  | 32.99%         | 0.00%           | 32.99%           |
| 27-01-2022      | 222     | 153.20         | 34010.40     | 850075  | 153.98         | 130892988.70 | 0                    | 109.26              | 92875121.06  | 22725690       | 109.26         | 2482899991.02 | 4028705                    | 153.50                 | 0.39%                   | 0.01%          | 21.10%          | 21.11%           |
| 02-02-2022      | 0       | 0.00           | 0.00         | 1322055 | 150.82         | 199390204.60 | 0                    | 109.26              | 144441394.19 | 21403635       | 109.26         | 2338458596.83 | 6468690                    | 150.60                 | -0.07%                  | 0.00%          | 20.44%          | 20.44%           |
| 03-02-2022      | 0       | 0.00           | 0.00         | 800000  | 148.70         | 118960000.00 | 0                    | 109.26              | 87404166.51  | 20603635       | 109.26         | 2251054430.32 | 5736483                    | 151.10                 | 0.33%                   | 0.00%          | 13.95%          | 13.95%           |
| 22-02-2022      | 0       | 0.00           | 0.00         | 300000  | 147.60         | 44280332.50  | 0                    | 109.26              | 32776562.44  | 20303635       | 109.26         | 2218277867.88 | 4419411                    | 147.70                 | -0.81%                  | 0.00%          | 6.79%           | 6.79%            |
| Total           | 3026818 | 153.11         | 463421299.50 | 4922582 | 150.36         | 740147057.20 | 0                    | 108.02              | 531739036.76 | 20303635       | 109.26         | 2218277867.88 |                            |                        |                         |                |                 |                  |

| Summary   |                |            |            |                |            |           |                |              |            |                |              |                     |              |                |                |               |
|-----------|----------------|------------|------------|----------------|------------|-----------|----------------|--------------|------------|----------------|--------------|---------------------|--------------|----------------|----------------|---------------|
| Block Buy |                |            | Block Sale |                |            | Total Buy |                |              | Total Sale |                |              | Cost of Shares Sold |              | Stock Position |                |               |
| Qty       | Price (W.Avg.) | Amount     | Qty        | Price (W.Avg.) | Amount     | Qty       | Price (W.Avg.) | Amount       | Qty        | Price (W.Avg.) | Amount       | Price (W.Avg.)      | Amount       | Qty            | Price (W.Avg.) | Amount        |
| 27000     | 162.34         | 4383100.00 | 22000      | 137.27         | 3020000.00 | 3026818   | 153.11         | 463421299.50 | 4922582    | 150.36         | 740147057.20 | 108.02              | 531739036.76 | 20303635       | 109.26         | 2218277867.88 |

### c) Gain/Loss by Momtazur Rahman from 02.01.2022 to 10.03.2022:

|                                      |              |                                                                            |
|--------------------------------------|--------------|----------------------------------------------------------------------------|
| Realized Capital gain(loss) per unit | 42.34        | Average Sale Price - Average Cost Price                                    |
| Realized Capital gain(loss)%         | 39.19%       | Gain (loss) Per Unit/Cost Per Unit                                         |
| Realized Capital gain(loss)TK        | 208408020.44 | Total Sale Quantity x Gain (loss) Per Unit                                 |
| Closing Price (10-03-2022)           | 152.00       | Closing Price of Last Investigation Date                                   |
| Unrealized gain(loss) per unit       | 42.74        | Closing Price of Last Investigation Date - Average Price of Stock Position |
| Unrealized gain(loss) %              | 39.12%       | Unrealized gain (loss) per unit /Average Price of Stock Position           |
| Unrealized gain(loss) TK             | 867874652.13 | Quantity of Stock Position x Unrealized gain (loss) per unit               |



# Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক মার্চ ০১, ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭(পার্ট-২)/২০২২/২২৭ স্মারকমূলে MR. MOMTAZUR RAHMAN-কে মার্চ ১৯, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত তারিখ মার্চ ২৭, ২০২৩ এ MR. MOMTAZUR RAHMAN এর পক্ষে Mr. Shafiul Islam Khan শুনানীতে উপস্থিত হয়ে মার্চ ২৩, ২০২৩ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

*"with due respect I would like to state that I Momtazur Rahman involved in stock market since January 01, 2015 and maintaining following BO Accounts with different Brokerage houses in my name, family members & associates:*

| Sl. No. | Client Name               | BO ID            | Name of the TREC Holder | Relation |
|---------|---------------------------|------------------|-------------------------|----------|
| 01      | Momtazur Rahman           | 1201930019678719 | Beximco Securities Ltd. |          |
| 02      | Momtazur Rahman           | 1605400019678719 | Janata Capital & Inv.   |          |
| 03      | Momtazur Rahman           | 1204500019678719 | City Brokerage Ltd.     |          |
| 04      | Apollo Trading Ltd.       | 1201930069100429 | Beximco Securities Ltd. | Director |
|         |                           | 1605400069100429 | Janata Capital & Inv.   |          |
| 05      | Art International Ltd.    | 1201930068671701 | Beximco Securities Ltd. | Director |
| 06      | National Investment & Fin | 1201930033596026 | Beximco Securities Ltd. | Director |
| 07      | Jupitar Business Ltd.     | 1201930046413474 | Beximco Securities Ltd. | Director |
| 08      | Jupitar Business Ltd.     | 1205400046413474 | Janata Capital & Inv.   | Director |

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

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

*Please note that, since I have started investing in secondary market I have realized & unrealized profit (loss) of BDT 3,124,335,759.00 and BDT (37,414,243.00) in the following client codes (Personal) respectively:*

| Sl. No. | Client Name               | BO ID            | Realized profit & Loss (BDT) |
|---------|---------------------------|------------------|------------------------------|
| 01      | Momtazur Rahman           | 1201930019678719 | 2,453,488,442.16             |
| 02      | Momtazur Rahman           | 1605400019678719 | 522,200,356.59               |
| 03      | Momtazur Rahman           | 1204500019678719 | 71,925,537.06                |
| 04      | Apollo Trading Ltd.       | 1201930069100429 | (6,511,705.77)               |
|         |                           | 1605400069100429 | 728,376,562.00               |
| 05      | Art International Ltd.    | 1201930068671701 | 1,013,546,884.82             |
| 06      | National Investment & Fin | 1201930033596026 | (111,356,458.03)             |
| 07      | Jupitar Business Ltd.     | 1201930046413474 | (125,032,405.70)             |
| 08      | Jupitar Business Ltd.     | 1205400046413474 | 1,079,700,778.00             |

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

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



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

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

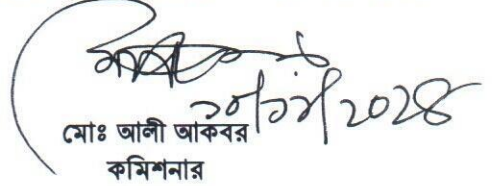
যেহেতু, MR. MOMTAZUR RAHMAN-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য MR. MOMTAZUR RAHMAN-কে অর্থদণ্ডে দণ্ডিত করা প্রয়োজন ও সমীচীন;

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

- MR. MOMTAZUR RAHMAN-কে মোট ১৮.০০ (আঠার) কোটি টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

  
মোঃ আলী আকবর  
কমিশনার

## বিতরণ:

- ১। MR. MOMTAZUR RAHMAN  
(BO ID: 1605400019678719,  
1201930019678719)  
57, Shabujbag, 1<sup>st</sup> Floor, Bashabo  
Sabujbag, Dhaka-1214