Bangladesh Securities and Exchange Commission

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

নং-বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৬০৫
তারিখঃ এপ্রিল ২২, ২০২৫

Mr. Kazi Farid Hasan
(BOID: 1205590073684359, 1605530073684359
and 1204480068944961)
House: 356/2, Road: 20 Standard Rashid Palace
Khilgaon, Dhaka-1213.

বিষয়: আদেশ।

কমিশনের আদেশ নং- **বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৬০৪ তারিখঃ এপ্রিল ২২, ২০২৫** এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

২২/০৪/২০২৫

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

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [SEC/MSI/2003-227 (Volume 02 & 03)]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

Bangladesh Securities and Exchange Commission

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

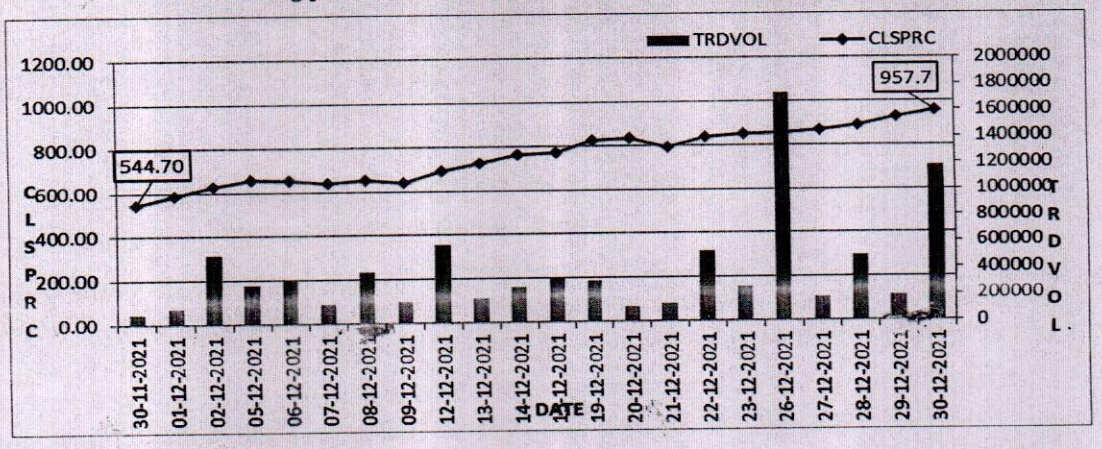
নং-বিএসইসি/এনফোর্সমেন্ট/৩২৭০/২০২২/৬০৪ তারিখঃ এপ্রিল ২২, ২০২৫

আদেশ

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

যেহেতু, জানুয়ারি ০৩, ২০২২ তারিখের Surveillance Note-01/2022 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০১.১২.২০২১ থেকে ৩১.১২.২০২১ পর্যন্ত সময়ে Sonali Paper & Board Mills Limited (SONALIPAPR)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Trends of closing price and trade volume OF 'SONALIPAPR' in public market:



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

A. Top Traders:

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

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

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

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

Findings:

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

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

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

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

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

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

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

Observation(s)-1:

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

Sl. No.	Client Name	Client Code	BO ID	Name of TREC Holder	Remarks
1	MD. ABUL KHAYER	S11118	1605530052137148	Southeast Bank Capital Services Ltd	The client himself and the operator of the group
2	MD. ABUL KHAYER	1689	1205950071091116	NRBC Bank Securities Limited	
3	MD. ABUL KHAYER	7647	1205590071091116	UCB Stock Brokerage Limited	
4	MD. ABUL KHAYER	AB[illegible]645	1605110071091116	Agrani Equity & Investment Limited	
5	MD. ABUL KHAYER	V01550	1206080071091116	Vertex Stock and Securities Limited	
6	ABUL KALAM MATBER	ABM663	1605110073447222	Agrani Equity & Investment Limited	Father of Mr. Md. Abul Khayer
7	ABUL KALAM MATBER	9166	1205590073447222	UCB Stock Brokerage Limited	
8	Abul Kalam Matber	43878	1201950068001021	EBL Securities Limited	
9	ABUL KALAM MATBER	08003	1204480068636491	IIDFC Securities Limited	
10	KAZI SADIA HASAN	3898	1205590068284973	UCB Stock Brokerage Limited	Wife of Mr. Md. Abul Khayer
11	Kazi Sadia Hasan	S2131	1604530066385504	SBL Capital Management Limited	
12	Kazi Sadia Hasan	43685	1201950066385504	EBL Securities Limited	
13	SAJED MADBAR	10057	1205590073870641	UCB Stock Brokerage Limited	Brother of Mr. Md. Abul Khayer
14	MOHAMMED BASHER	10058	1205590073870821	UCB Stock Brokerage Limited	
15	KONIKA AFROZE	S2194	1604530072558290	SBL Capital Management Limited	Sister of Mr. Abul Khayer
16	KAZI FARID HASAN	91[illegible]	1205590073684359	UCB Stock Brokerage Limited	Brother in law of Mr. Md. Abul Khayer
17	KAZI FARID HASAN	S1[illegible]	1605530073684359	Southeast Bank Capital Services Ltd	
18	KAZI FARID HASAN	08013	1204480068944961	IIDFC Securities Limited	
19	D I T CO-OPERATIVE LTD.	7022	1205590065757811	UCB Stock Brokerage Limited	Business entity owned and operated by Mr. Md. Abul Khayer
20	D I T CO-OPERATIVE LTD.	1688	1205950065757811	NRBC Bank Securities Limited	
21	D I T CO-OPERATIVE LTD.	S2116	1604530065757811	SBL Capital Management Limited	
22	MONARCH HOTEL & RESORTS LTD.	N0191	1606150074345647	UCB Investment Limited	
23	MONARCH HOLDINGS LIMITED	ABM646	1605110071212010	Agrani Equity & Investment Limited	
24	Softavion Ltd	43816	1201950067588060	EBL Securities Limited	
25	SHAKIB AL HASAN	S2142	1604530069585574	SBL Capital Management Limited	Both Shakib Al Hasan and Mr. Javed A Matin is the director and Chairman of Monarch Holdings Limited
26	SHAKIB AL HASAN	45050	1201950064976237	EBL Securities Limited	
27	Shakib Al Hasan	45800	1201950074169484	EBL Securities Limited	
28	SHAKIB AL HASAN	08049	1204480064976237	IIDFC Securities Limited	
29	SHAKIB AL HASAN	S11294	1605530064976237	Southeast Bank Capital Services Ltd	
30	JAVEED A MATIN	S11295	1605530069025711	Southeast Bank Capital Services Ltd	

Bangladesh Securities and Exchange Commission

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

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

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

Date	Code # S11118				Code # 1689				Code # 7647				Code # ABM645				Code # V01550				Code # ABM663			
	BO ID # 1605530052137148				BO ID # 1205950071091116				BO ID # 1205590071091116				BO ID # 1605110071091116				BO ID#1206080071091116				BO ID # 1605110073447222			
	MD. ABUL KHAYER				MD. ABUL KHAYER				MD. ABUL KHAYER				MD. ABUL KHAYER				MD. ABUL KHAYER				ABUL KALAM MATBER			
	Southeast Bank Capital Services Ltd				NRBC Bank Securities Limited				UCB Stock Brokerage Limited				Agrani Equity & Investment Limited				Vertex Stock and Securities Limited				Agrani Equity & Investment Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2021	28000	584.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-12-2021	0	0.00	0	0.00	60000	628.92	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	11176	659.79	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	146000	667.03
08-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3923	643.18	0	0.00
09-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8376	641.78	0	0.00	0	0.00	0	0.00	0	0.00
12-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	93000	688.56	0	0.00
13-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	41642	711.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	558	768.46	0	0.00	0	0.00	0	0.00	98025	770.25	0	0.00
19-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10000	825.67	0	0.00
20-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	470	845.80	0	0.00	0	0.00	0	0.00
22-12-2021	53900	841.52	65000	843.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-12-2021	11100	855.70	0	0.00	38000	843.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-12-2021	52580	870.47	219838	895.00	0	0.00	0	0.00	15000	877.79	1000	855.16	0	0.00	0	0.00	0	0.00	0	0.00	209940	899.75	200000	892.00
27-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-12-2021	208079	894.14	0	0.00	23500	892.57	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	73552	957.67	28144	955.45	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	353659		284838		121500		0		88552		29144		53376		8376		470		0		414888		346009	

Date	Code # 9166				Code # 43878				Code # 08003				Code # 3898				Code # S2131				Code # 43685			
	BO ID # 1205590073447222				BO ID # 1201950068001021				BO ID#1204480068636491				BO ID # 1205590068284973				BO ID # 1604530066385504				BO ID # 1201950066385504			
	ABUL KALAM MATBER				Abul Kalam Matber				ABUL KALAM MATBER				KAZI SADIA HASAN				Kazi Sadia Hasan				Kazi Sadia Hasan			
	UCB Stock Brokerage Limited				EBL Securities Limited				IIDFC Securities Limited				UCB Stock Brokerage Limited				SBL Capital Management Limited				EBL Securities Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8237	651.31	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-12-2021	0	0.00	0	0.00	9000	650.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2500	650.20	0	0.00
09-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	144041	688.25	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8900	765.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-12-2021	0	0.00	0	0.00	27061	817.41	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-12-2021	0	0.00	8794	836.46	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	9005	840.86	221000	809.00	0	0.00	0	0.00	0	0.00	0	0.00
23-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	50000	852.58	0	0.00	39139	854.18	0	0.00
26-12-2021	70000	879.38	0	0.00	61799	857.00	0	0.00	0	0.00	0	0.00	20000	879.80	0	0.00	32169	856.19	0	0.00	0	0.00	0	0.00
27-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	57000	878.70	0	0.00	0	0.00	0	0.00
28-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	35286	881.27	0	0.00	0	0.00	0	0.00
29-12-2021	0	0.00	0	0.00	8149	927.77	0	0.00	0	0.00	0	0.00	0	0.00	240	929.29	6008	931.69	0	0.00	300	921.00	0	0.00
30-12-2021	10000	957.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	80000		8794		106009		0		0		0		190183		221240		180463		0		41939		0	

Bangladesh Securities and Exchange Commission

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

Date	Code # S2142				Code # 45050				Code # 45800				Code # 08049				Code # S11294				Code # 9177			
	BO ID # 1604530069585574				BO ID # 1201950064976237				BO ID # 1201950074169484				BO ID # 1204480064976237				BO ID # 1605530064976237				BO ID # 1205590073684359			
	SHAKIB AL HASAN				SHAKIB AL HASAN				Shakib Al Hasan				SHAKIB AL HASAN				SHAKIB AL HASAN				KAZI FARID HASAN			
	SBL Capital Management Limited				EBL Securities Limited				EBL Securities Limited				IIDFC Securities Limited				Southeast Bank Capital Services Ltd				UCB Stock Brokerage Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-12-2021	0	0.00	0	0.00	3265	629.40	2400	629.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1000	684.02	0	0.00	0	0.00	0	0.00	0	0.00	35098	656.90
14-12-2021	0	0.00	0	0.00	0	0.00	265	762.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-12-2021	25000	853.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-12-2021	93415	856.26	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	6571	897.21	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	118415		0		3265		2665		6571		0		1000		0		0		0		0		35098	

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

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Date	Code # 7022				Code # 1688				Code # S2116				Code # N019				Code # ABM646				Code # 43816			
	BO ID # 1205590065757811				BO ID # 1205950065757811				BO ID # 1604530065757811				BO ID # 1606150074345644				BO ID # 1605110071212010				BO ID # 1201950067588060			
	D I T CO-OPERATIVE LTD.				D I T CO-OPERATIVE LTD.				D I T CO-OPERATIVE LTD.				MONARCH HOTEL & RESORTS LTD.				MONARCH HOLDINGS LIMITED				Softavion Ltd.			
	UCB Stock Brokerage Limited				NRBC Bank Securities Limited				SBL Capital Management Limited				UCB Investment Limited				Agrani Equity & Investment Limited				EBL Securities Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-12-2021	71000	614.29	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	54742	507.13	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	24324	558.73	0	0.00	0	0.00	30000	663.60	0	0.00	0	0.00
06-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4500	559.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	9660	671.55	103370	667.73	0	0.00	0	0.00
09-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	77329	691.10	2625	691.10	0	0.00
13-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	80000	781.30	0	0.00	0	0.00	1700	827.20	0	0.00
20-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8000	835.00
22-12-2021	29000	837.63	0	0.00	0	0.00	0	0.00	8564	838.53	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2105	926.93	0	0.00
30-12-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	135081	959.66	0	0.00
Total	100000		0		0		0		8564		0		83566		80000		9660		210699		141511		8000	

Date	Total					
	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
Drag from this cell	0	-	-	0	-	-
01-12-2021	28000	584.30	16,360,354.00	0	-	-
02-12-2021	194007	617.44	119,787,479.70	2650	629.31	1,667,670.00
05-12-2021	43737	657.60	28,761,437.30	30000	663.60	19,907,905.00
06-12-2021	4500	659.90	2,969,569.40	146000	667.03	97,385,674.30
08-12-2021	25083	657.47	16,491,261.70	103370	667.73	69,023,177.50
09-12-2021	0	-	-	43474	653.99	28,431,400.60
12-12-2021	240666	688.38	165,670,096.60	131329	691.10	90,761,471.90
13-12-2021	41642	711.61	29,632,733.60	0	-	-
14-12-2021	0	-	-	265	762.20	201,983.00
15-12-2021	107483	769.81	82,741,893.80	0	-	-
19-12-2021	38761	819.97	31,782,801.70	80000	781.30	62,504,000.00
20-12-2021	470	845.80	397,526.00	16794	835.76	14,035,817.10
22-12-2021	100469	840.09	84,402,674.00	286000	816.91	233,636,132.00
23-12-2021	163239	851.08	138,929,424.40	0	-	-
26-12-2021	566903	878.42	497,976,910.90	420838	893.48	376,010,165.10
27-12-2021	57000	878.70	50,085,900.00	0	-	-
28-12-2021	273436	892.42	244,019,187.60	0	-	-
29-12-2021	16562	928.96	15,385,442.00	240	929.29	223,030.00
30-12-2021	218633	958.90	209,647,521.50	28144	955.45	26,890,239.50
Total	2120591			1289104		

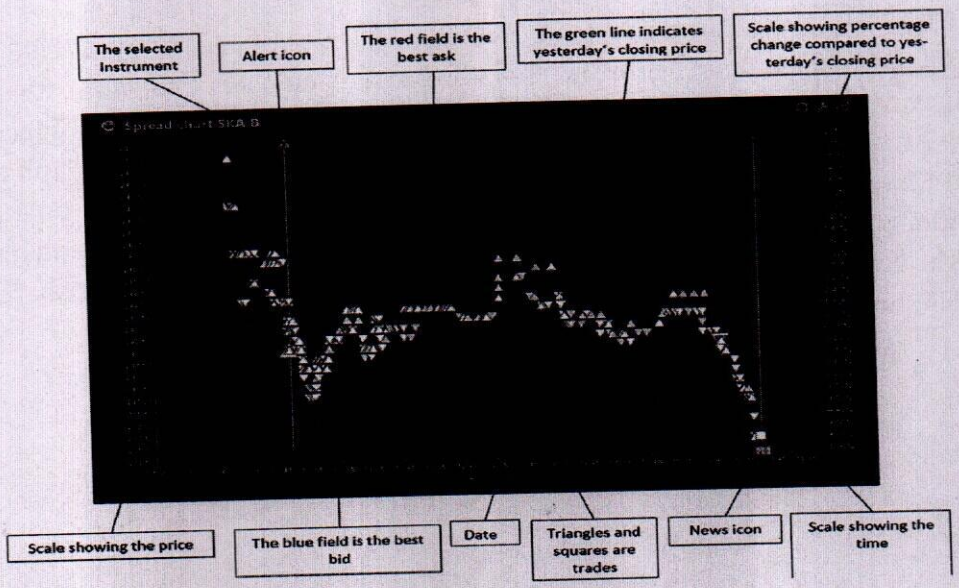
b) Effects of "SONALIPAPR" at DSE (both Public Market and Block Market) by Mr. Md. Abul Khayer and his associates:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	8	9	10	11	12	13	14	15	16	17	18
Opening Balance									1609594.8	564.75	909021141.12						
01-12-2021	238000	569.33	135500354.00	4000	580.00	2320000.00	565.34	2261364.87	1843594.8	565.34	1042260130.25	461140	585.50	0.00%	51.61%	0.87%	52.48%
02-12-2021	194007	617.44	119787479.70	2650	629.31	1667670.00	570.30	1511299.30	2034951.8	570.30	1160536310.65	527501	629.30	7.48%	36.78%	0.50%	37.28%
05-12-2021	43737	657.60	28761437.30	30000	663.60	19907905.00	572.14	17164152.92	2048688.8	572.14	1172133595.03	297097	657.90	4.54%	14.72%	10.10%	24.82%
06-12-2021	4500	659.90	2969569.40	246000	643.74	158360674.30	572.33	140793373.92	1807188.8	572.33	1034309790.51	488139	653.30	-0.70%	0.92%	50.40%	51.32%
08-12-2021	25083	657.47	16491261.70	103370	667.73	69023177.50	573.50	59282309.95	1728901.8	573.50	991518742.25	381987	652.60	2.10%	6.57%	27.06%	33.63%
09-12-2021	0	0.00	0.00	51474	647.17	33312200.60	573.50	29520147.26	1677427.8	573.50	961998594.99	168502	642.90	-1.49%	0.00%	30.55%	30.55%
12-12-2021	240666	688.38	165670096.60	135329	690.48	93441471.90	587.91	79561425.18	1782764.8	587.91	1048107266.41	591166	691.10	7.50%	40.71%	22.89%	63.60%
13-12-2021	41642	711.61	29632733.60	60000	650.00	39000000.00	590.73	35444068.72	1764406.8	590.73	1042295931.28	288477	723.90	4.75%	14.44%	20.80%	35.23%
14-12-2021	0	0.00	0.00	24965	698.34	17433983.00	590.73	14747686.26	1739441.8	590.73	1027548245.02	337585	762.90	5.39%	0.00%	7.40%	7.40%
15-12-2021	107483	769.81	82741893.80	5500	720.00	3960000.00	601.16	3306358.64	1841424.8	601.16	1106983780.19	342348	769.50	0.87%	31.40%	1.61%	33.00%
19-12-2021	38761	819.97	31782801.70	80000	781.30	62504000.00	605.67	48453363.79	1800185.8	605.67	1090313218.10	306669	827.20	7.50%	12.64%	26.09%	38.73%
20-12-2021	470	845.80	397526.00	169794	803.54	136435817.10	605.73	102849273.07	1630861.8	605.73	987861471.03	335078	832.90	0.69%	0.14%	50.67%	50.81%
22-12-2021	100469	840.09	84402674.00	413000	811.71	335236132.00	619.33	255783061.16	1318330.8	619.33	816481083.87	678663	840.70	6.24%	14.80%	60.85%	75.66%
23-12-2021	163239	851.08	138929424.40	0	0.00	0.00	0.00	0.00	1481569.8	644.86	955410508.27	261368	853.50	1.52%	62.46%	0.00%	62.46%
26-12-2021	566903	878.42	497976910.90	420838	893.48	376010165.10	709.50	298583732.59	1627634.8	709.50	1154803686.59	1735021	855.30	0.21%	32.67%	24.26%	56.93%
27-12-2021	57000	878.70	50085900.00	0	0.00	0.00	0.00	0.00	1684634.8	715.22	1204889586.59	170653	868.60	1.56%	33.40%	0.00%	33.40%
28-12-2021	273436	892.42	244019187.60	77000	850.00	65450000.00	739.97	56977498.27	1881070.8	739.97	1391931275.93	564236	889.70	2.43%	48.46%	13.65%	62.11%
29-12-2021	16562	928.96	15385442.00	15240	880.78	13423030.00	741.62	11302242.87	1882392.8	741.62	1396014475.06	201012	927.40	4.24%	8.24%	7.58%	15.82%
30-12-2021	369633	971.61	359137521.50	28144	955.45	26890239.50	779.37	21934472.42	2223881.8	779.37	1733217524.14	1327785	957.70	3.27%	27.84%	2.12%	29.96%
Total	2481591	807.41	2003672214.20	1867304	778.86	1454376466.00	631.65	1179475831.18	2223881.8	779.37	1733217524.14						

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

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

The details of the graphs are given below:



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

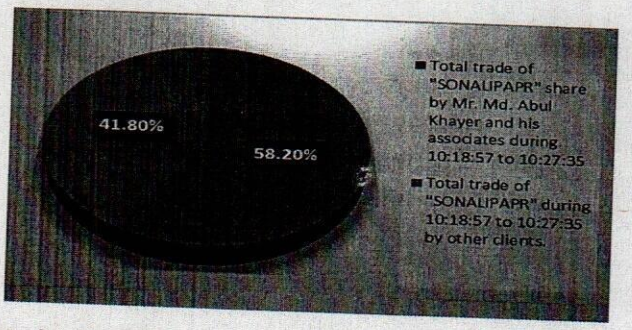
△ White triangle represents trade of shares of **'SONALIPAPR'** by other clients

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

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

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

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

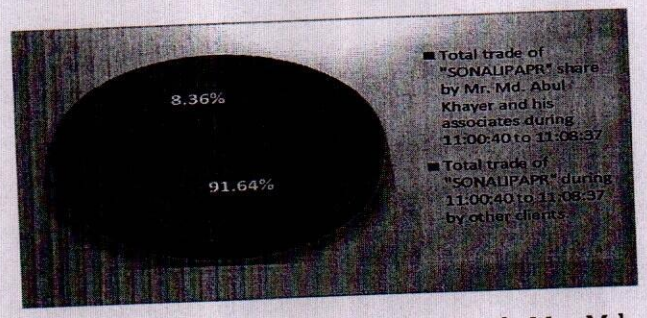


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 140 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 277.

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

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

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

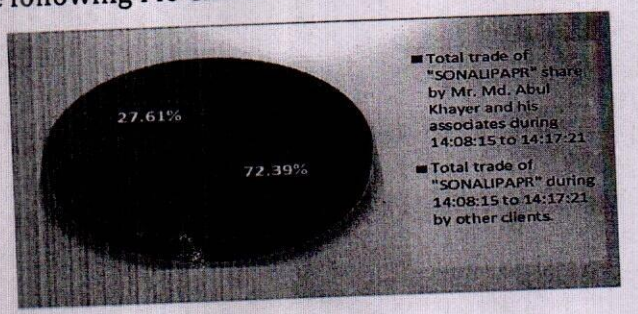


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 130 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 180.

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

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

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

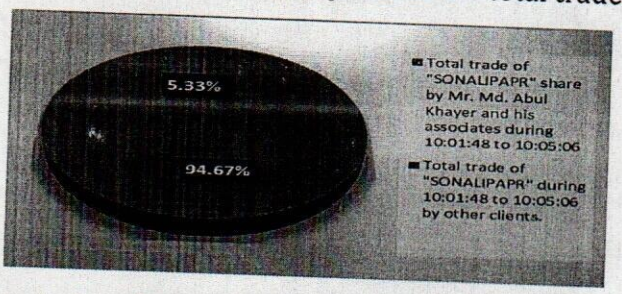


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 111 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 166.

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

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

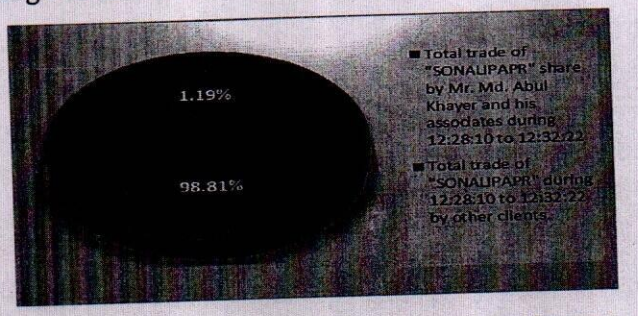
On 12-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 664.10 which is Tk. 21.20 more than the YCP of Tk. 642.90. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:01:48 at price Tk. 671.00 and induced the same to rise to Tk. 691.10 up to 10:05:06. It can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



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

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

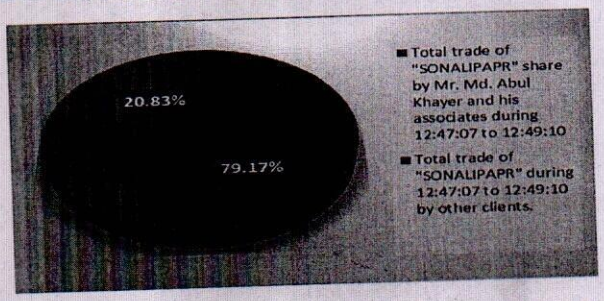
Again, on 12-12-2021, Mr. Md. Abul Khayer and his associates started series of trading at 12:28:10 at price Tk. 667.10 for the second time and induced the same to rise to Tk. 691.10 up to 12:32:22. It can also be observed from the graph that Mr. Md. Abul Khayer and his associates executed significant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



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

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

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

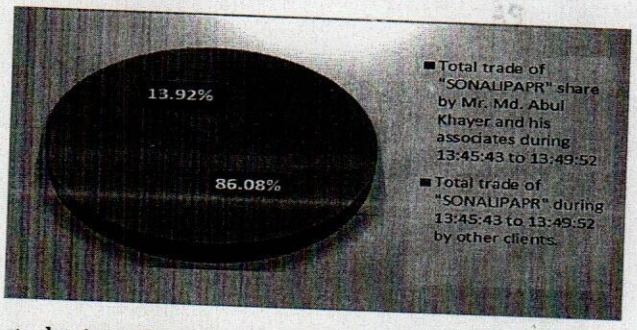


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 130 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 149.

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

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

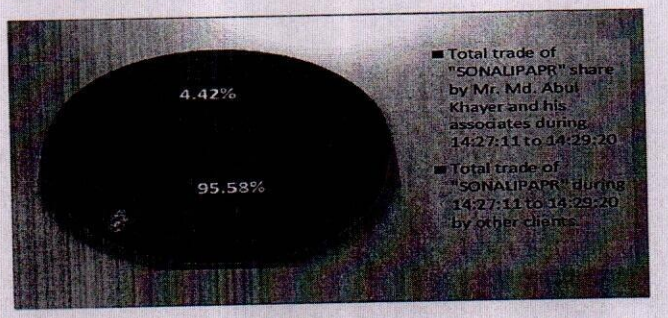
On 13-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 699.00 which is Tk. 7.90 more than the YCP of Tk. 691.10. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 13:45:43 at price Tk. 694.60 and induced the same to rise to Tk. 715.00 up to 13:49:52. It can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



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

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

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

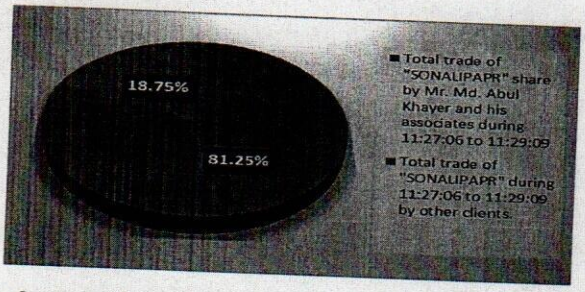


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 50 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 60.

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

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

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

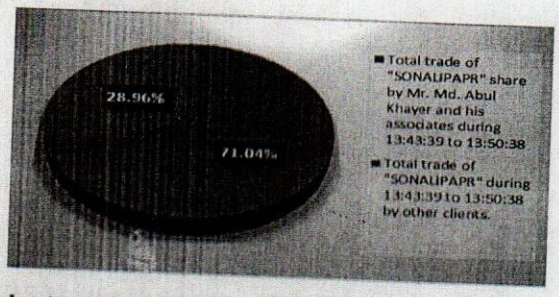


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 116 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 188.

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

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

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

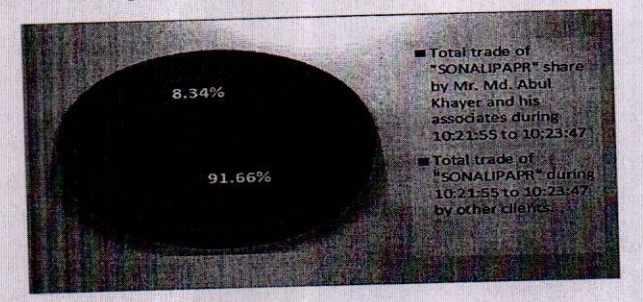


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 133 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 206.

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

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

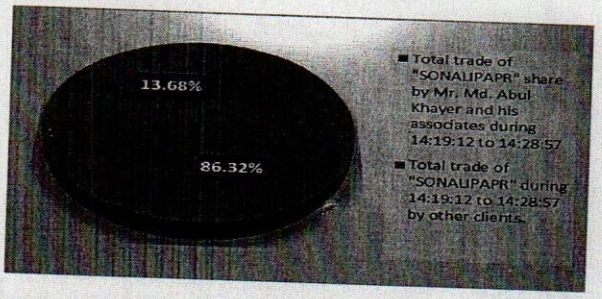
On 22-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 796.90 which is Tk. 5.60 more than the YCP of Tk. 791.30. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:21:55 at price Tk. 811.90 and induced the same to rise to Tk. 850.00 up to 10:23:47. It can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



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

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

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

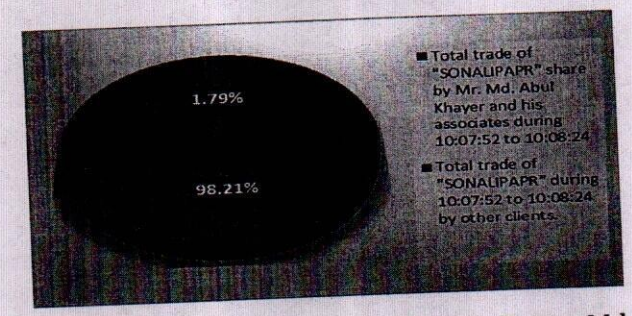


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 183 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 228.

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

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

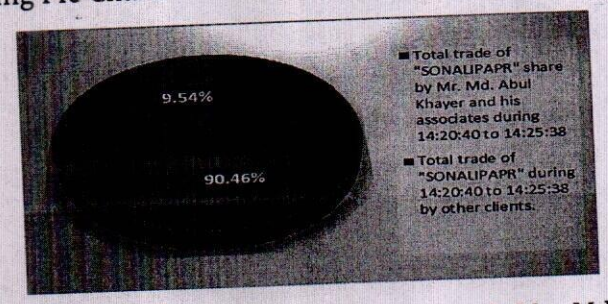
On 23-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 852.60 which is Tk. 11.90 more than the YCP of Tk. 840.70. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 10:07:52 at price Tk. 847.50 and induced the same to rise to Tk. 858.90 up to 10:08:24. It can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



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

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

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

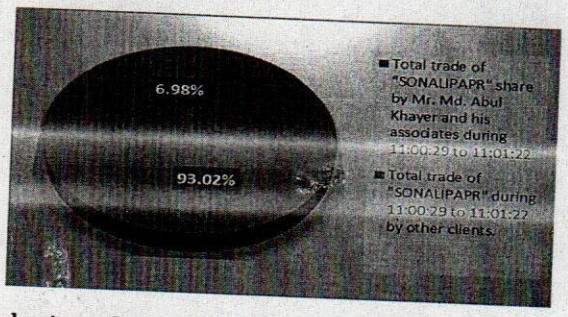


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 152 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 173.

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

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

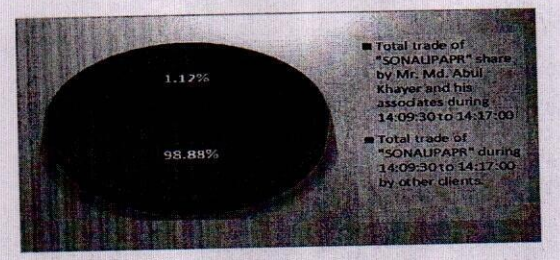
On 26-12-2021, trading of shares of "SONALIPAPR" was started at Tk. 865.00 which is Tk. 11.50 more than the YCP of Tk. 853.50. On that day, Mr. Md. Abul Khayer and his associates started series of trading at 11:00:29 at price Tk. 883.90 and induced the same to rise to Tk. 900.00 up to 11:01:22. It can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



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

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

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

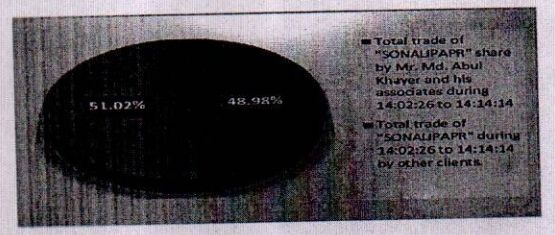


It is also found that during the aforementioned period, Mr. Md. Abul Khayer and his associates executed 103 howlas to purchase of shares of "SONALIPAPR" compared to the total number of howlas of 116.

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

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

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



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

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

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
361000	744.13	268630000.00	578200	750.08	433697800.00	2481591	807.41	2003672214.20	1867304	778.86	1454376466.00	631.65	1179475831.18	2223882	779.37	1733217524.14

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

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

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

Finding(s)-1:

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

.....

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

.....

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

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

Contravention(s)-1:

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

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

Observations - 2:

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

Sl. No.	Name of the Account	BOID	Client Code	Share balance of SONALIPAPR hold by Mr. Md. Abul Khayer and his associates as on 30.12.21	
				Total	Percent (%)
1	MD ABUL KHAYER	1605530052137148	S11118	304,451	1.3862
2	MD. ABUL KHAYER	1205950071091116	1689	241,500	1.0996
3	MD. ABUL KHAYER	1205590071091116	7647	190,221	0.8661
4	MD. ABUL KHAYER	1605110071091116	ABM645	45,000	0.2049
5	MD ABUL KHAYER	1206080071091116	V01550	470	0.0021
6	[illegible]	[illegible]	[illegible]	209,540	0.9539
7	[illegible]	[illegible]	[illegible]	1,570	0.0071
8	[illegible]	[illegible]	[illegible]	105,009	0.4781
9	[illegible]	[illegible]	[illegible]	19,490	0.0887
10	KAZI SADIA HASAN	1205590068784875	3898	29,697	0.1352
11	Kazi Sadia Hasan	1604530066385504	S2131	203,561	0.9268
12	Kazi Sadia Hasan	1201950066385504	43685	66,106	0.3010
13	SAJED MADBAR	1205590073870641	10057	131,918	0.6006
14	MOHAMMAD BASHER	1205590073870821	10058	37,000	0.1685
15	KONIKA AFROZE	1604530072553290	S2194	910	0.0041
16	KAZI FARID HASAN	1205590073684359	9177	0	0.0000
17	KAZI FARID HASAN	1605530073684359	S11331	30,288	0.1379
18	KAZI FARID HASAN	1204480068944961	08013	0	0.0000
19	D I T CO-OPERATIVE LTD.	1205590065757811	7022	133,000	0.6056
20	D I T CO-OPERATIVE LTD.	1205950065757811	1688	11,040	0.0503
21	D I T CO-OPERATIVE LTD.	1604530065757811	S2116	8,564	0.0390
22	MONARCH HOTEL & RESORTS LTD.	1606150074345644	N019	6,166	0.0281
23	MONARCH HOLDINGS LIMITED	1605110071212010	ABM646	10	0.0000
24	Softavion Ltd.	1201950067588060	43816	157,661	0.7178
25	SHAKIB AL HASAN	1604530069585574	S2142	120,176	0.5472
26	SHAKIB AL HASAN	1201950064976237	45050	3,791	0.0170
27	Shakib Al Hasan	1201950074169484	45800	6,571	0.0299
28	SHAKIB AL HASAN	1204480064976237	08049	1000	0.0046
29	SHAKIB AL HASAN	1605530064976237	S11294	766	0.0035
30	JAVEED A MATIN	1605530069025711	S11295	900	0.0041
			Total holdings	2,228,016	10.14
	No. of outstanding securities of 'SONLIPAPR' as on 30.12.2021			21,963,460	

Findings -2:

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

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

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

" ----৪। এক্সচেঞ্জ হইতে নগদ অর্থের বিনিময়ে উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন বা অধিগ্রহন (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 অধিগ্রহন করিতে চাহিলে অর্জন বা অধিগ্রহন পরবর্তী ধারণকৃত মোট শেয়ারের পরিমান 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 অধিগ্রহনকারীর স্টক ব্রোকার বা মার্চেন্ট ব্যাংকারের মাধ্যমে দাখিল করিতে হইবে। ..... "

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

Contravention-2:

Mr. Md. Abul Khayer and his associates have violated the following:

বিধি ৪(১) of **বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮** by jointly acquiring more than 10% shares of **"SONALIPAPR"** without following the mentioned law.

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

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

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

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

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

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

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

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

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

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

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

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

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

যেহেতু, Mr. Kazi Farid Hasan-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. Kazi Farid Hasan-কে জরিমানা করা প্রয়োজন ও সমীচীন;

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

- Mr. Kazi Farid Hasan-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘন করায় ২.০০ (দুই) কোটি টাকা এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লঙ্ঘন করায় ১.০০ (এক) লক্ষ টাকা **[মোট ২.০১ (দুই কোটি এক লক্ষ) টাকা]** অর্থদন্ড ধার্য্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,

২২/০৪/২০২৫
মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। **Mr. Kazi Farid Hasan**
(BOID: 1205590073684359, 1605530073684359
and 1204480068944961)
House: 356/2, Road: 20 Standard Rashid Palace
Khilgaon, Dhaka-1213.