

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

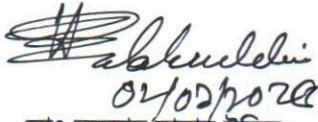
নং-বিএসইসি/এনফোর্সমেন্ট/৩০৮৫(পার্ট-২)/২০২১/২৪
তারিখঃ জানুয়ারি ০২, ২০২৫

Mrs. Konika Afroze
(BOID: 1205590072553290, 1604530072553290
1605180073786062)
54 no Dinara, PO: Old Noria
Shariatpur-8020.

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩০৮৫(পার্ট-২)/২০২১/২৩ তারিখঃ জানুয়ারি ০২, ২০২৫ এর
সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


০২/০১/২০২৫

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, এমএসআই, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/MSI/2021-1036]
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/৩০৮৫(পার্ট-২)/২০২১/২৩

তারিখঃ জানুয়ারি ০২, 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, অক্টোবর ২৮, ২০২১ তারিখের Surveillance Note- 064/2021 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 ০৭.১০.২০২১ থেকে ২৭.১০.২০২১ পর্যন্ত সময়কালে NRB Commercial Bank Limited (NRBCBANK)-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:

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

The price of the shares of 'NRBCBANK' was increased from 23.80 to 38.30 which was increased by 60.92% from 07.10.2021 to 27.10.2021. The major buyers of the period were as follows:

Sl. No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quant ity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	ABM663	Abul Kalam Matber	1605110073447222	Agrani Equity & Investment Limited	21781375	21126963	42908338	204592120	20.97
2	ABM645	Md. Abul Khayer	1605110071091116	Agrani Equity & Investment Limited	19354640	14794880	34149520	204592120	16.69
3	7677	Konika Afroze	1205590072553290	UCB Stock Brokerage Limited	9020000	0	9020000	204592120	4.409
4	3898	Kazi Sadia Hasan	1205590068284973	UCB Stock Brokerage Limited	7467470	0	7467470	204592120	3.65
5	9166	Abul Kalam Matber	1205590073447222	UCB Stock Brokerage Limited	3208000	0	3208000	204592120	1.568
6	41999	Nur -E- Alam	1201950062070101	EBL Securities Limited	3200908	2875060	6075968	204592120	2.97
7	CM400	Sharmin Islam	1605170068001733	City Bank Capital Resources Limited	2146692	1446692	3593384	204592120	1.756
8	002396	Md. Abul Khayer	1204590067712781	Premier Bank Securities Ltd.	1769632	0	1769632	204592120	0.865
9	V00675	Kabir Ahmed	1206080068477348	Vertex Stock and Securities Limited	1562352	1560329	3122681	204592120	1.526
10	S2131	Kazi Sadia Hasan	1604530066385504	SBL Capital Management Limited	1544319	740000	2284319	204592120	1.117
11	B4765	Aleya Begum	1604650073870706	BRAC EPL Investments Limited	1530000	0	1530000	204592120	0.748
12	S2204	Tanvir Ahamad Mishuk	1604530073714252	SBL Capital Management Limited	1286744	0	1286744	204592120	0.629
13	S11118	Md. Abul Khayer	1605530052137148	Southeast Bank Capital Services Ltd	1193000	0	1193000	204592120	0.583
14	BS207	Md. Tysir Khan	1201820074128456	BRAC EPL Stock Brokerage Limited	1162285	0	1162285	204592120	0.568
15	45124	Navana Pharmaceuticals Limited	1201950074243791	EBL Securities Limited	1150000	0	1150000	204592120	0.562
16	6345	Aalok Properties & Mgt Ltd	1205590073811509	UCB Stock Brokerage Limited	1110000	0	1110000	204592120	0.543
17	FC2057	Md. Sanowar Khan	1604630069527917	FAS Capital Management Limited	1100000	1100000	2200000	204592120	1.075
18	M028	A.K.M. Shamsuddoha	1204500022198665	City Brokerage Limited	1090000	0	1090000	204592120	0.533
19	27277	M/S Karib Traders	1203000068230888	Commerce Bank Securities and Investment Limited	1041176	540000	1581176	204592120	0.773
20	S2206	Masuma Parvin	1604530073766464	SBL Capital Management Limited	1029106	0	1029106	204592120	0.503

Findings:

- After analyzing documents, it is observed that **Mr. Abul Kalam Matber** (Client code # ABM663 of Agrani Equity & Investment Limited) was the top buyer of the shares of "NRBCBANK" from 07.10.2021 to 27.10.2021. He also participated in trading the shares of same company along with his another account (Client code # 9166 of UCB Stock Brokerage Ltd.). He is the father of **Mr. Abul Khayer** (client code # ABM645 of Agrani Equity & Investment Limited, the 2nd top buyer) who actively participated in trading shares of the aforesaid company with an association with the following account holders:

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

- His wife **Ms. Kazi Sadia Hasan**, (Client code # 3898 of UCB Stock Brokerage Limited, the 4th top buyer and S2131 of SBL Capital Management Limited),
- His brother, named **Sajed Madbar** (client code # B4767 of BRAC EPL Investment Limited) and **Mohammad Basher** (Client code # B4766 of BRAC EPL Investment Limited),
- His sister, named **Konika Afroze** (client code # 7677 of UCB Stock Brokerage Limited, the 3rd top buyer, client code # S2194 of SBL Capital Management Limited and 50012 of Sonali Investment Limited),
- His step mother, named **Aleya Begum** (Client code # B4765 of BRAC EPL Investment Limited),
- The **Monarch Holdings Limited** (Client code # ABM646 of Agrani Equity & Investment Limited),
- The **D I T Co-Operative Ltd.** (client code # 7022 of UCB Stock Brokerage Limited and S2116 of SBL Capital Management Limited),

In addition to the above mentioned accounts, it is also observed that **Mr. Abul Khayer** has also participated in trading of the shares of aforementioned company along with 04 (four) more accounts maintained in his name (Client code # 002396 of Premier Bank Securities Limited, the 8th top buyer, client code # S11118 of Southeast Bank Capital Services Ltd., the 13th top buyer and client code # 42080 of EBL Securities Ltd. and 7647 of UCB Stock Brokerage Limited)

However, with these **21 (Twenty-One) accounts**, they jointly traded **53.38%** shares of "NRBCBANK" during the investigation period.

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

The list of major sellers of shares of 'NRBCBANK' from 07.10.2021 to 27.10.2021 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	ABM663	Abul Kalam Matber	1605110073447222	Agrani Equity & Investment Limited	21781375	21126963	42908338	204592120	20.97
2	ABM645	Md. Abul Khayer	1605110071091116	Agrani Equity & Investment Limited	19354640	14794880	34149520	204592120	16.69
3	41999	Nur -E- Alam	1201950062070101	EBL Securities Limited	3200908	2875060	6075968	204592120	2.97
4	1595	Sks Foundation	1205950073534838	NRBC Bank Securities Limited	0	2118541	2118541	204592120	1.035
5	9780	Chowdhury Fazle Imam	1205590043602094	UCB Stock Brokerage Limited	0	1580000	1580000	204592120	0.772
6	992	Arif Sikder	1205590068969760	NRBC Bank Securities Limited	20000	1576800	1596800	204592120	0.78
7	V00675	Kabir Ahmed	1206080068477348	Vertex Stock and Securities Limited	1562352	1560329	3122681	204592120	1.526
8	4810	Arbim Techo Ltd	1602170068895861	Mercantile Bank Securities Limited	0	1500000	1500000	204592120	0.733
9	CM400	Sharmin Islam	1605170068001733	City Bank Capital Resources Limited	2146692	1446692	3593384	204592120	1.756
10	T12688	Mosammed Nasima Akter Munni	1201830069747539	LANKABANGLA Securities Ltd.	343045	1291933	1634978	204592120	0.799
11	1262	Syed Shoeb Ahmed	1205950072715552	NRBC Bank Securities Limited	0	1150000	1150000	204592120	0.562
12	FC2057	Md. Sanowar Khan	1604630069527917	FAS Capital Management Limited	1100000	1100000	2200000	204592120	1.075
13	06060	Mahmuda Akter Mukta	1204090069164538	Shahjalal Islami Bank Securities Limited	984000	1010005	1994005	204592120	0.975
14	1918	Fariha Mahzebin	1205950074227538	NRBC Bank Securities Limited	1000000	940700	1940700	204592120	0.949
15	7751	Mohammad Hasanuzzaman	1204490062704913	Bank Asia Securities Limited	589000	919000	1508000	204592120	0.737
16	H2854	Md. Mehedi Hasan Razim	1201910069558070	UniCap Securities Limited	543850	807700	1351550	204592120	0.661
17	D18689	Shahadat Hossain	1204220069507690	International Leasing Securities Ltd.	805000	805000	1610000	204592120	0.787
18	ABM632	Arif Masud Chowdhury	1605110021646575	Agrani Equity & Investment Limited	0	800000	800000	204592120	0.391
19	1138	Md Rafiqul Islam	1203780069214396	Nexus Securities Limited	900000	800000	1700000	204592120	0.831
20	N860	S. M. Mahbulul Alam	1602110073566772	Prime Bank Investment Limited	0	770001	770001	204592120	0.376

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Findings:

- After analyzing documents, it is observed that **Mr. Abul Kalam Matber** (Client code # ABM663 of Agrani Equity & Investment Limited) was the top seller of shares of "NRBCBANK" from 07.10.2021 to 27.10.2021. He was associated with **Mr. Abul Khayer** (client code # ABM645 of Agrani Equity & Investment Ltd.) who participated in trading shares of "NRBCBANK" during the aforesaid investigation period and they jointly traded **53.38%** shares of "NRBCBANK" through 21 (Twenty-One) accounts during the period.

A. Trading of Mr. Md. Abul Khayer and his associates:

Observation(s)-1:

Mr. Md. Abul Khayer (client code # ABM645 & BOID # 1605110071091116 of Agrani Equity & Investment Limited) was the 2nd **top buyer** of shares of "NRBCBANK" from the period of 07.10.2021 to 27.10.2021. After examining the relevant documents, it was also observed that the said client participated in trading of shares of "NRBCBANK" in association with 20 (Twenty) account holders maintained by his family members and business entity (owned by them) 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	ABM645	1605110071091116	Agrani Equity & Investment Limited	Accounts in the name of Mr. Abul Khayer
2	Md. Abul Khayer	002396	1204590067712781	Premier Bank Securities Ltd.	
3	MD. ABUL KHAYER	7647	1205590071091116	UCB Stock Brokerage Limited	
4	Md. Abul Khayer	42080	1201950062164535	EBL Securities Limited	
5	Md. Abul Khayer	S11118	1605530052137148	Southeast Bank Capital Services Ltd	
6	ABUL KALAM MATBER	ABM663	1605110073447222	Agrani Equity & Investment Limited	Father of Mr. Abul Khayer
7	ABUL KALAM MATBER	9166	1205590073447222	UCB Stock Brokerage Limited	
8	ALEYA BEGUM	B4765	1604650073870706	BRAC EPL Investments Limited	Mother of Mr. Abul Khayer
9	Kazi Sadia Hasan	S2131	1604530066385504	SBL Capital Management Limited	Wife of Mr. Abul Khayer
10	KAZI SADIA HASAN	3898	1205590068284973	UCB Stock Brokerage Limited	
11	SAJED MADBAR	B4767	1604650073870641	BRAC EPL Investments Limited	Brothers of Mr. Abul Khayer
12	MOHAMMAD BASHER	B4766	1604650073870821	BRAC EPL Investments Limited	
13	KONIKA AFROZE	7677	1205590072553290	UCB Stock Brokerage Limited	Sister of Mr. Abul Khayer
14	KONIKA AFROZE	S2194	1604530072553290	SBL Capital Management Limited	
15	KONIKA AFROZE	50012	1605180073786062	Sonali Investment Limited	
16	MONARCH HOLDINGS LIMITED	ABM646	1605110071212010	Agrani Equity & Investment Limited	The account of business entity directed by Mr. Abul Khayer
17	D I T CO-OPERATIVE LTD.	7022	1205590065757811	UCB Stock Brokerage Limited	The accounts maintained by Mr. Abul Khayer
18	D I T CO-OPERATIVE LTD.	S2116	1604530065757811	SBL Capital Management Limited	

www.sec.gov.bd

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

[illegible]

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

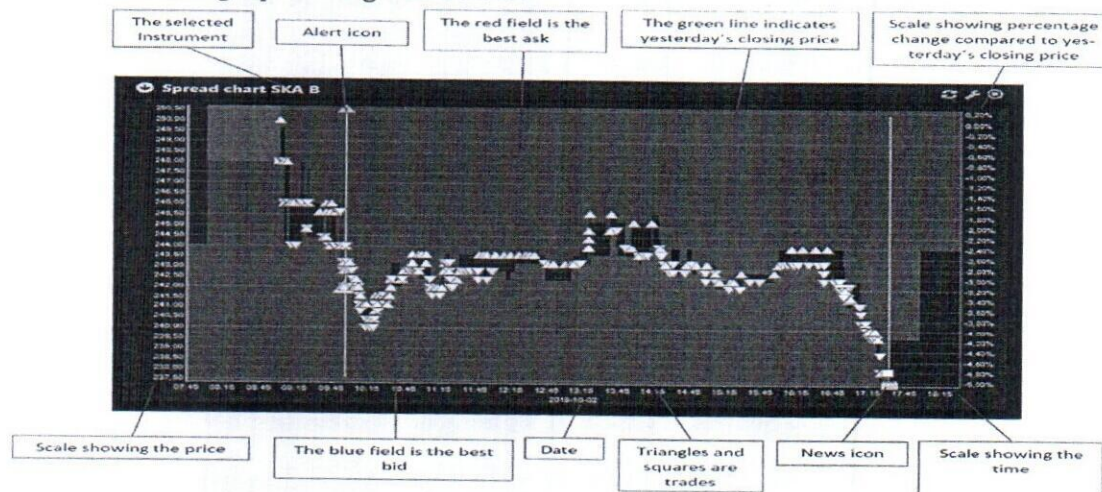
Effects of "NRBCBANK" at DSE (both Public Market and Block Market) by Mr. Md. Abul Khayer and his associates:

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Opening Balance										0	0.00	0.00						
12-10-2021	3932656	26.40	103815363.70	0	0.00	0.00		0.00	0.00	3932656	26.40	103815363.70	5802006	27.10	9.72%	67.78%	0.00%	67.78%
13-10-2021	7477711	29.80	222835787.80	0	0.00	0.00		0.00	0.00	11410367	28.63	326651151.50	12319375	29.80	9.96%	60.70%	0.00%	60.70%
14-10-2021	9706856	31.01	301057565.70	100000	30.30	3030000.00		29.72	2972496.51	21017223	29.72	624736220.69	23690892	31.60	6.04%	40.97%	0.42%	41.40%
17-10-2021	9163186	33.90	310634260.00	5629409	33.73	189874140.20		30.99	174470233.40	24551000	30.99	760900247.29	23641354	34.20	8.23%	38.76%	23.81%	62.57%
18-10-2021	4277295	34.64	148162828.00	0	0.00	0.00		0.00	0.00	28828295	31.53	909063075.29	13190640	34.80	1.75%	32.43%	0.00%	32.43%
19-10-2021	1083661	32.79	35528086.90	19409046	32.74	635531362.50		31.58	612919239.32	10502910	31.58	331671922.87	31769560	31.50	-9.48%	3.41%	61.09%	64.50%
21-10-2021	10125744	33.56	339829412.50	1274895	34.56	44056367.00		32.55	41500220.76	19353759	32.55	630001114.61	18015211	34.60	9.84%	56.21%	7.08%	63.28%
24-10-2021	9521481	36.00	342799902.00	300000	34.10	10230000.00		33.69	10106939.54	28575240	33.69	962694077.07	20811126	36.00	4.05%	45.75%	1.44%	47.19%
25-10-2021	614000	34.90	21428600.00	614000	34.90	21428600.00		33.72	20701166.72	28575240	33.72	963421510.34	9150747	35.00	-2.78%	6.71%	6.71%	13.42%
26-10-2021	11561982	35.86	414593176.50	9208493	35.88	330397984.20		34.33	316151391.79	30928729	34.33	1061863295.06	21279492	36.20	3.43%	54.33%	43.27%	97.61%
27-10-2021	4198726	38.25	160609143.20	1015000	37.19	37745186.60		34.80	35323069.23	34112455	34.80	1187149369.03	17116135	38.30	5.80%	24.53%	5.93%	30.46%
Total	71663298	33.51	2401294126.30	37550843	33.88	1272293640.50	0	32.33	1214144757.27	34112455	34.80	1187149369.03						

b) 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 'NRBCBANK' during the investigation period.

The details of the graphs are given below:



- ▲ Green triangle represents trade of 'NRBCBANK' by Mr. Md. Abul Khayer and his associates
- △ White triangle represents trade of shares of 'NRBCBANK' 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 'NRBCBANK' which influenced to uplift the price of the said securities on several dates delineated as follows:

(Signature)

Bangladesh Securities and Exchange Commission

Enforcement Division

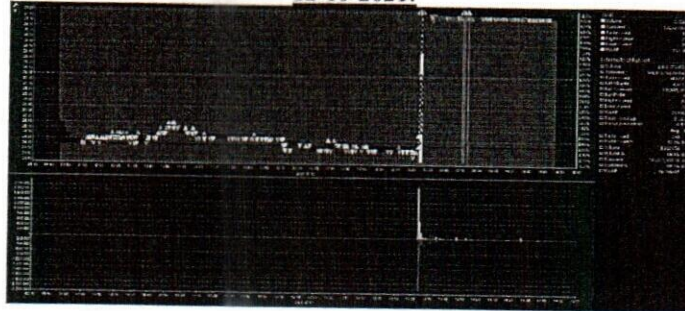
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

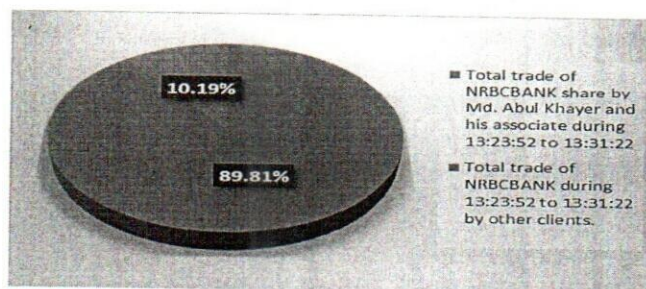
BODs: 1605110071091116, 1204590067712781, 1205590071091116, 1201950062164535,
1605530052137148, 1605110073447222, 1205590073447222, 1604650073870706,
1604530066385504, 1205590068284973, 1604650073870641, 1604650073870821,
1205590072553290, 1604530072553290, 1605180073786062, 1604530069585574,
1201950064976237, 1605530064976237, 1605110071212010, 1205590065757811
and 1604530065757811 (combined):

12-10-2021:

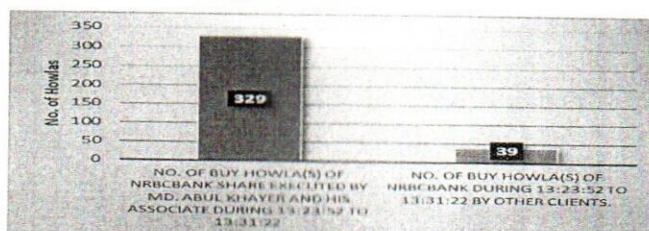


It was observed in the above graph that on 12-10-2021, total number of trades of NRBCBANK in the market was 1049, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 548 which is approximately 52.2% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 5,752,006 whereas, buy volume by the said client(s) was 3,932,656 which is approximately 68.4% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-10-2021 in trading of Shares of NRBCBANK.

On 12-10-2021, trading of Shares of NRBCBANK was started at Tk. 24.70 which is similar to the YCP (i.e. Tk. 24.70). On that day, Md. Abul Khayer and his associates started series of trading at 13:23:52 at price Tk. 24.80 and induced the same to rise to Tk. 27.10 up to 13:31:22. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 13:23:52 to 13:31:22, Md. Abul Khayer and his associates bought 3,150,000 shares of NRBCBANK compared to the total traded share of 3,507,400. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 329 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 368 as shown in the following Bar Chart:



Bangladesh Securities and Exchange Commission

Enforcement Division

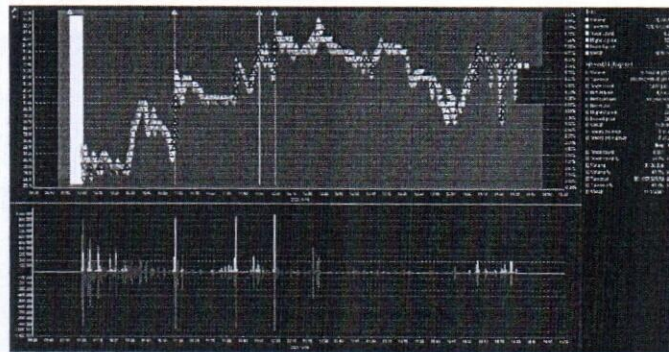
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

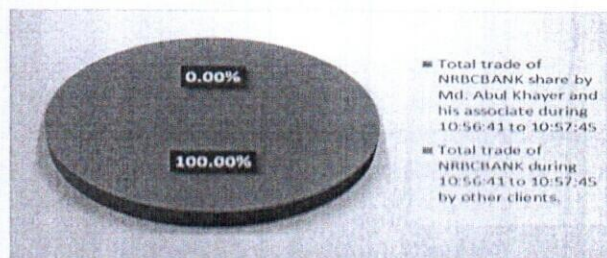
It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 89.81% of the total trades of Shares of NRBCBANKs by executing 329 of total 368 howlas from 13:23:52 to 13:31:22 on 12-10-2021. From 13:23:52 to 13:31:22, Md. Abul Khayer and his associates induced the price to rise from Tk. 24.80 to Tk. 27.10. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of NRBCBANK. At the end of the day, the share price of 'NRBCBANK' was increased by Tk. 2.40 which is approximately 9.72% higher than YCP.

14-10-2021



It was observed in the above graph that on 14-10-2021, total number of trades of NRBCBANK in the market was 6222, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 1887 which is approximately 30.33% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 23,590,892 whereas buy volume by the said client(s) was 9,706,856 which is approximately 41.15% of the total traded volume in the market. It is evident that the client had significant participation in the market on 14-10-2021 in trading of Shares of "NRBCBANK".

On 14-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 30.30 which is Tk. 0.50 more than the YCP of Tk. 29.80. On that day, Md. Abul Khayer and his associates started series of trading at 10:56:41 at price Tk. 30.30 and induced the same to rise to Tk. 31.10 up to 10:57:45. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:56:41 to 10:57:45, Md. Abul Khayer and his associates bought 1,209,346 shares of NRBCBANK compared to the total traded share of 1,209,346. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 188 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 188 as shown in the following Bar Chart:

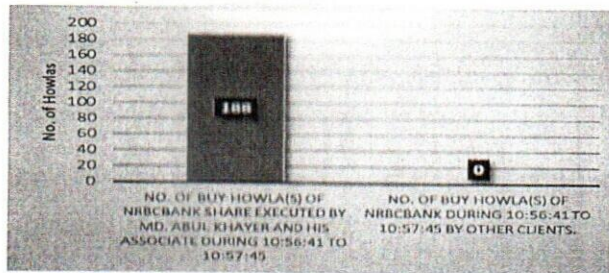
Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

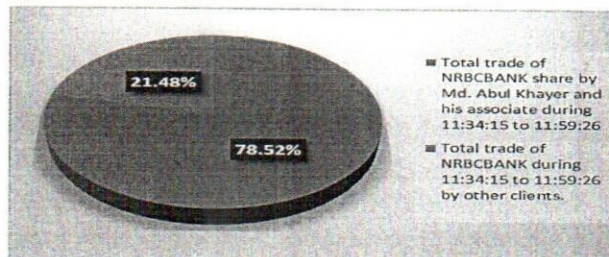
Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

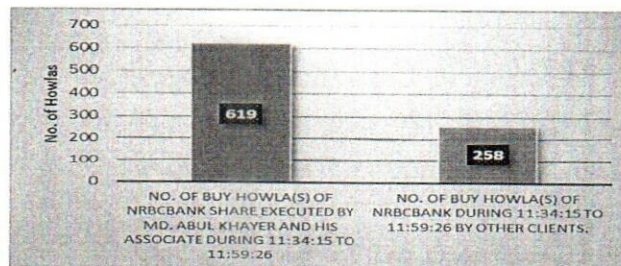


It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 100.00% of the total trades of Shares of "NRBCBANK" by executing 188 of total 188 howlas from 10:56:41 to 10:57:45 on 14-10-2021. From 10:56:41 to 10:57:45, Md. Abul Khayer and his associates induced the price to rise from Tk. 30.30 to Tk. 31.10.

On the same date, Md. Abul Khayer and his associates started series of trading at 11:34:15 at price Tk. 31.00 for the second time and induced the same to rise to Tk. 32.00 up to 11:59:26. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 11:34:15 to 11:59:26, Md. Abul Khayer and his associates bought 3,088,973 shares of NRBCBANK compared to the total traded share of 3,933,766. This is shown in the following Pie Chart:



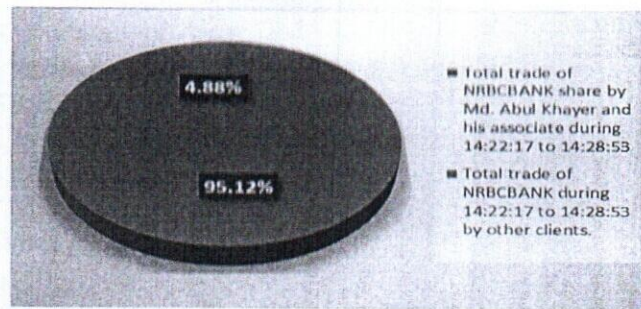
It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 619 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 877 as shown in the following Bar Chart:



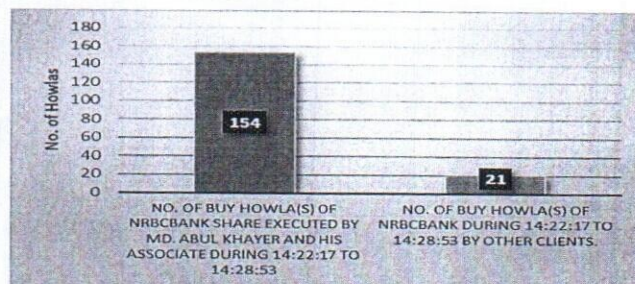
It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 78.52% of the total trades of Shares of "NRBCBANK" by executing 619 of total 877 howlas from 11:34:15 to 11:59:26 on 14-10-2021. From 11:34:15 to 11:59:26, Md. Abul Khayer and his associates induced the price to rise from Tk. 31.00 to Tk. 32.00.

Again, on 14-10-2021, Md. Abul Khayer and his associates started series of trading at 14:22:17 at price Tk. 30.80 at the last moment of trading and induced the same to rise to Tk. 31.80 up to 14:28:53. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:22:17 to 14:28:53, Md. Abul Khayer and his associates bought 703,567 shares of NRBCBANK compared to the total traded share of 739,700. This is shown in the following Pie Chart:

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

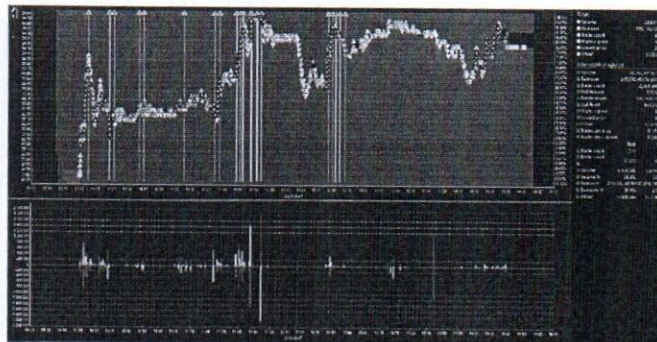


It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 154 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 175 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 95.12% of the total trades of Shares of "NRBCBANK" by executing 154 of total 175 howlas from 14:22:17 to 14:28:53 on 14-10-2021. From 14:22:17 to 14:28:53, Md. Abul Khayer and his associates induced the price to rise from Tk. 30.80 to Tk. 31.80. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 1.80 which is approximately 6.04% higher than YCP.

17-10-2021



It was observed in the above graph that on 17-10-2021, total number of trades of NRBCBANK in the market was 4674, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 1741 which is approximately 37.2% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 23,641,354 whereas buy volume by the said client(s) was 9,163,186 which is approximately 38.8% of the total traded volume in the market. It is evident that the client had significant participation in the market on 17-10-2021 in trading of Shares of "NRBCBANK".

Bangladesh Securities and Exchange Commission

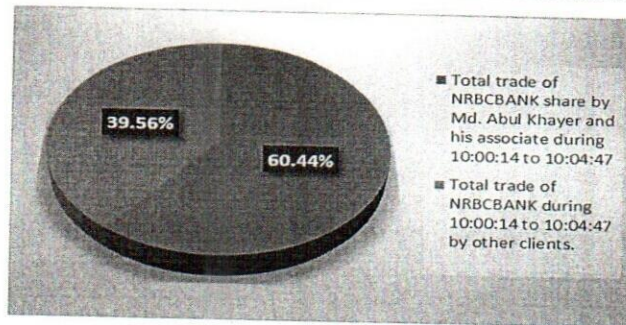
Enforcement Division

Enforcement Department

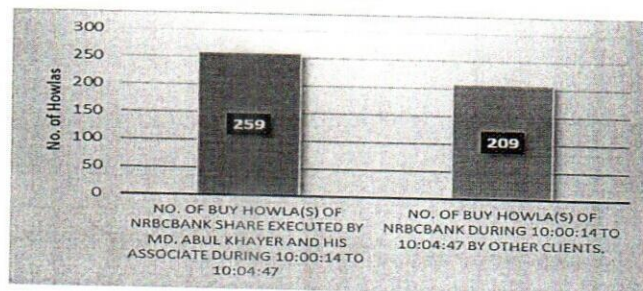
Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

On 17-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 31.60 which is similar to the YCP of Tk. 31.60. On that day, Md. Abul Khayer and his associates started series of trading at 10:00:14 at price Tk. 32.20 and induced the same to rise to Tk. 33.70 up to 10:04:47. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 10:00:14 to 10:04:47, Md. Abul Khayer and his associates bought 1,464,910 shares of NRBCBANK compared to the total traded share of 2,423,907. This is shown in the following Pie Chart:

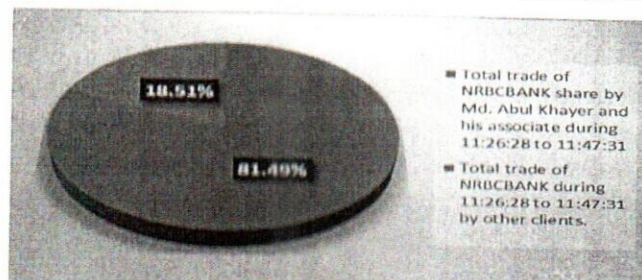


It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 259 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 468 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 60.44% of the total trades of Shares of "NRBCBANK" by executing 259 of total 468 howlas from 10:00:14 to 10:04:47 on 17-10-2021. From 10:00:14 to 10:04:47, Md. Abul Khayer and his associates induced the price to rise from Tk. 32.20 to Tk. 33.70.

On 17-10-2021, Md. Abul Khayer and his associates started series of trading at 11:26:28 at price Tk. 32.90 for the second time and induced the same to rise to Tk. 34.70 up to 11:47:31. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 11:26:28 to 11:47:31, Md. Abul Khayer and his associates bought 4,819,150 shares of NRBCBANK compared to the total traded share of 5,913,594. This is shown in the following Pie Chart:



Bangladesh Securities and Exchange Commission

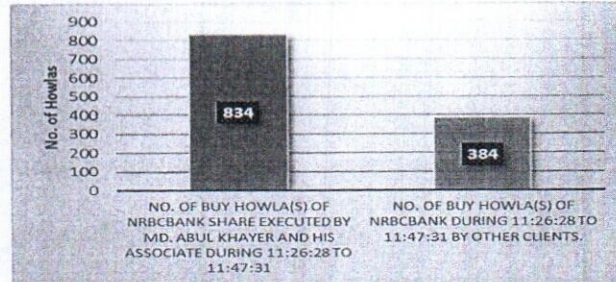
Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

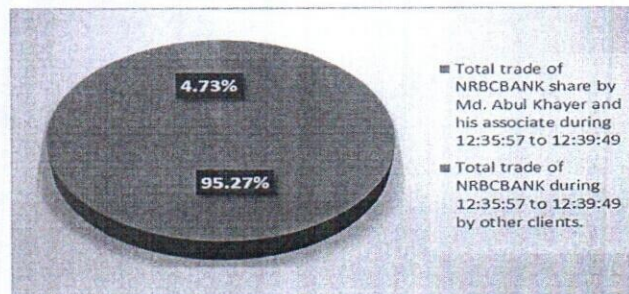
www.sec.gov.bd

It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 834 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 1,218 as shown in the following Bar Chart:

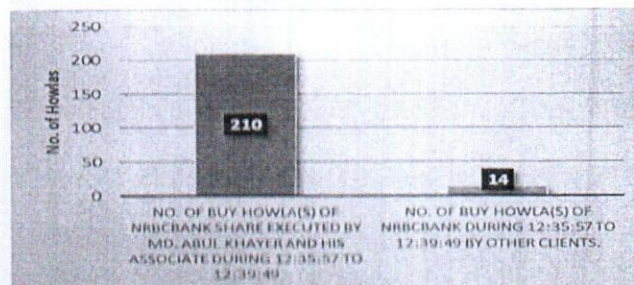


It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 81.49% of the total trades of Shares of "NRBCBANK" by executing 834 of total 1,218 howlas from 11:26:28 to 11:47:31 on 17-10-2021. From 11:26:28 to 11:47:31, Md. Abul Khayer and his associates induced the price to rise from Tk. 32.90 to Tk. 34.70.

On 17-10-2021, Md. Abul Khayer and his associates started series of trading at 12:35:57 at price Tk. 33.40 for the third time and induced the same to rise to Tk. 34.60 up to 12:39:49. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 12:35:57 to 12:39:49, Md. Abul Khayer and his associates bought 704,926 shares of NRBCBANK compared to the total traded share of 739,926. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 210 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 224 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 95.27% of the total trades of Shares of "NRBCBANK" by executing 210 of total 224 howlas from 12:35:57 to 12:39:49 on 17-10-2021. From 12:35:57 to 12:39:49, Md. Abul Khayer and his associates induced the price to rise from Tk. 33.40 to Tk. 34.60.

Bangladesh Securities and Exchange Commission

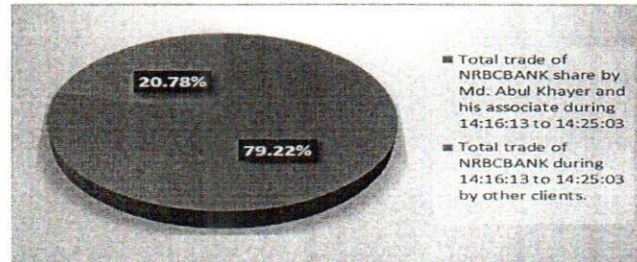
Enforcement Division

Enforcement Department

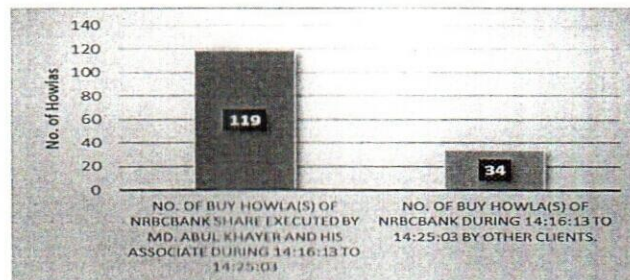
Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Finally, on 17-10-2021, Md. Abul Khayer and his associates started series of trading at 14:16:13 at price Tk. 33.80 at the last hour of trading session and induced the same to rise to Tk. 34.60 up to 14:25:03. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:16:13 to 14:25:03, Md. Abul Khayer and his associates bought 486,608 shares of NRBCBANK compared to the total traded share of 614,258. This is shown in the following Pie Chart:



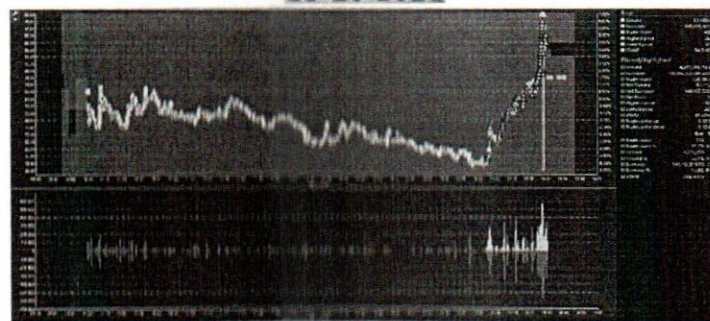
It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 119 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 153 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 79.22% of the total trades of Shares of "NRBCBANK" by executing 119 of total 153 howlas from 14:16:13 to 14:25:03 on 17-10-2021. From 14:16:13 to 14:25:03, Md. Abul Khayer and his associates induced the price to rise from Tk. 33.80 to Tk. 34.60.

Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 2.60 which is approximately 8.23% higher than YCP.

18-10-2021



It was observed in the above graph that on 18-10-2021, total number of trades of NRBCBANK in the market was 4016, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 736 which is approximately 18.3% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 13,190,640

Bangladesh Securities and Exchange Commission

Enforcement Division

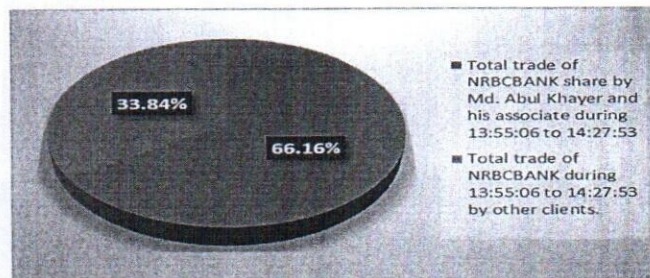
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

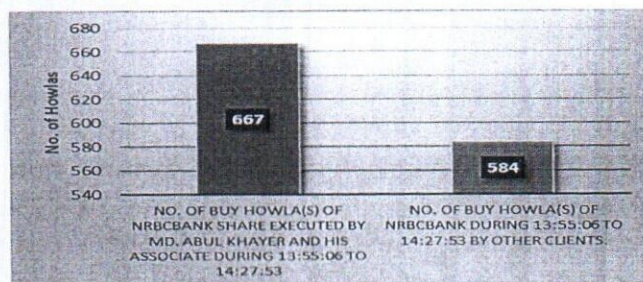
www.sec.gov.bd

whereas buy volume by the said client(s) was 4,277,295 which is approximately 32.4% of the total traded volume in the market.

On 18-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 34.40 which is Tk. 0.20 more than the YCP of Tk. 34.20. On that day, Md. Abul Khayer and his associates started series of trading at 13:55:06 at price Tk. 32.50 and induced the same to rise to Tk. 36.40 up to 14:27:53. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 13:55:06 to 14:27:53, Md. Abul Khayer and his associates bought 3,681,287 shares of NRBCBANK compared to the total traded share of 5,563,931. This is shown in the following Pie Chart:

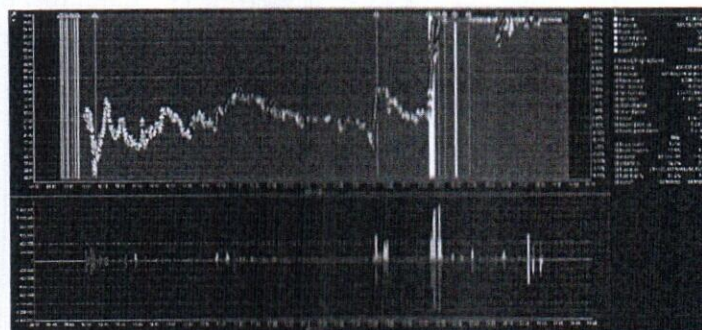


It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 667 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 1,251 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 66.16% of the total trades of Shares of "NRBCBANK" by executing 667 of total 1,251 howlas from 13:55:06 to 14:27:53 on 18-10-2021. From 13:55:06 to 14:27:53, Md. Abul Khayer and his associates induced the price to rise from Tk. 32.50 to Tk. 36.40. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 0.60 which is approximately 1.75% higher than YCP.

21-10-2021



Bangladesh Securities and Exchange Commission

Enforcement Division

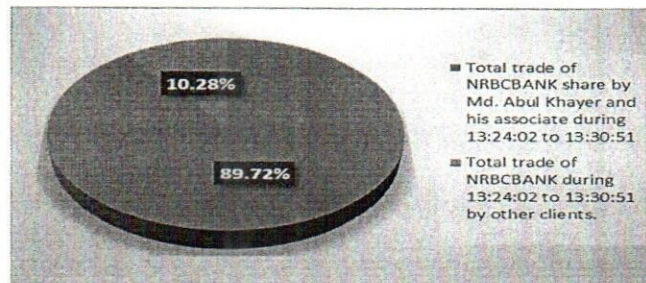
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

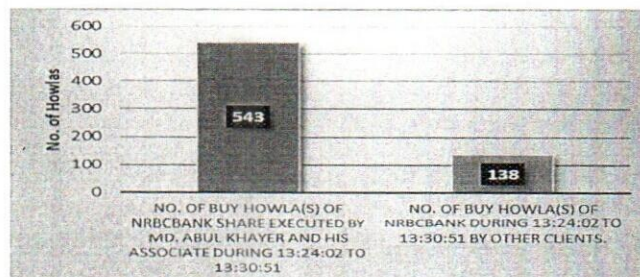
www.sec.gov.bd

It was observed in the above graph that on 21-10-2021, total number of trades of NRBCBANK in the market was 3357, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 1254 which is approximately 37.4% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 17,868,211 whereas buy volume by the said client(s) was 10,125,744 which is approximately 56.7% of the total traded volume in the market. It is evident that the client had significant participation in the market on 21-10-2021 in trading of Shares of "NRBCBANK".

On 21-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 31.90 which is Tk. 0.40 more than the YCP of Tk. 31.50. On that day, Md. Abul Khayer and his associates started series of trading at 13:24:02 at price Tk. 32.10 and induced the same to rise to Tk. 34.60 up to 13:30:51. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 13:24:02 to 13:30:51, Md. Abul Khayer and his associates bought 5,241,423 shares of NRBCBANK compared to the total traded share of 5,841,805. This is shown in the following Pie Chart:



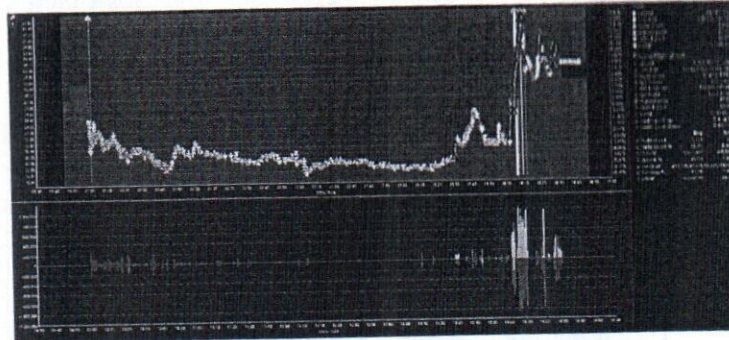
It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 543 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 681 as shown in the following Bar Chart:



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 89.72% of the total trades of Shares of "NRBCBANK" by executing 543 of total 681 howlas from 13:24:02 to 13:30:51 on 21-10-2021. From 13:24:02 to 13:30:51, Md. Abul Khayer and his associates induced the price to rise from Tk. 32.10 to Tk. 34.60. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 3.10 which is approximately 9.84% higher than YCP.

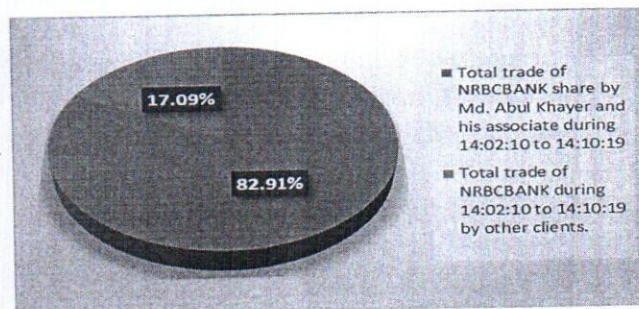
Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

24-10-2021

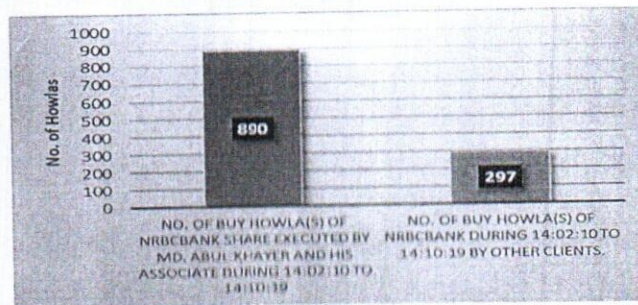


It was observed in the above graph that on 24-10-2021, total number of trades of NRBCBANK in the market was 4886, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 1126 which is approximately 23.0% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 20,811,126 whereas buy volume by the said client(s) was 9,521,481 which is approximately 45.8% of the total traded volume in the market. It is evident that the client had significant participation in the market on 24-10-2021 in trading of Shares of "NRBCBANK".

On 24-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 34.30 which is Tk. 0.30 less than the YCP of Tk. 34.60. On that day, Md. Abul Khayer and his associates started series of trading at 14:02:10 at price Tk. 33.60 and induced the same to rise to Tk. 37.50 up to 14:10:19. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:02:10 to 14:10:19, Md. Abul Khayer and his associates bought 7,061,104 shares of NRBCBANK compared to the total traded share of 8,516,610. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 890 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 1,187 as shown in the following Bar Chart:



Bangladesh Securities and Exchange Commission

Enforcement Division

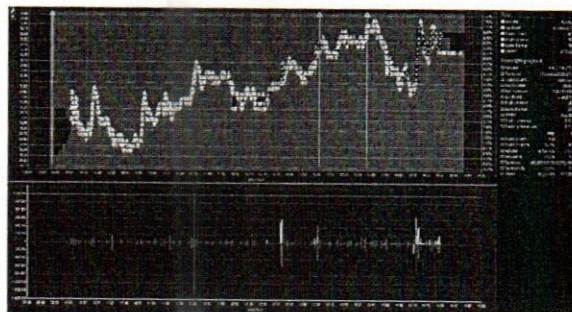
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

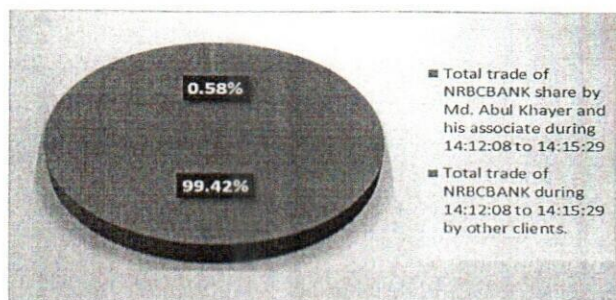
It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 82.91% of the total trades of Shares of "NRBCBANK" by executing 890 of total 1,187 howlas from 14:02:10 to 14:10:19 on 24-10-2021. From 14:02:10 to 14:10:19, Md. Abul Khayer and his associates induced the price to rise from Tk. 33.60 to Tk. 37.50. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 1.40 which is approximately 4.05% higher than YCP.

27-10-2021



It was observed in the above graph that on 27-10-2021, total number of trades of NRBCBANK in the market was 4383, whereas number of trades (buy) executed by Md. Abul Khayer and his associates were 530 which is approximately 12.09% of the total number of trades in the market. Again, total traded volume of NRBCBANK in the market on that day was 16,326,135 whereas buy volume by the said client(s) was 4,198,726 which is approximately 25.72% of the total traded volume in the market. It is evident that the client had significant participation in the market on 27-10-2021 in trading of Shares of "NRBCBANK".

On 27-10-2021, trading of Shares of "NRBCBANK" was started at Tk. 37.00 which is Tk. 0.80 more than the YCP of Tk. 36.20. On that day, Md. Abul Khayer and his associates started series of trading at 14:12:08 at price Tk. 37.80 and induced the same to rise to Tk. 38.80 up to 14:15:29. It can also be observed from the above graph that Md. Abul Khayer and his associates executed significant trades during this time period. It is mentionable here that from 14:12:08 to 14:15:29, Md. Abul Khayer and his associates bought 1,760,700 shares of NRBCBANK compared to the total traded share of 1,771,023. This is shown in the following Pie Chart:



It is also found that during the aforementioned period, Md. Abul Khayer and his associates executed 171 howlas to purchase of shares of NRBCBANK compared to the total number of howlas of 179 as shown in the following Bar Chart:

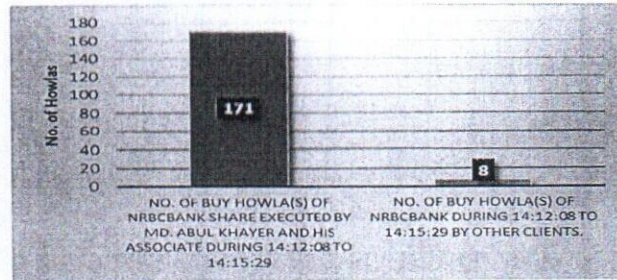
Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd



It is observed from the above graphs and screenshot that Md. Abul Khayer and his associates bought 99.42% of the total trades of Shares of "NRBCBANK" by executing 171 of total 179 howlas from 14:12:08 to 14:15:29 on 27-10-2021. From 14:12:08 to 14:15:29, Md. Abul Khayer and his associates induced the price to rise from Tk. 37.80 to Tk. 38.80. Thus it seems that Md. Abul Khayer and his associates were actively trying to lift the price of Shares of "NRBCBANK". At the end of the day price of Shares of "NRBCBANK" was increased by Tk. 2.10 which is approximately 5.80% higher than YCP.

c) Gain and Loss by Mr. Md. Abul Khayer and his associates from 07.10.2021 to 27.10.2021:

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
0	0.00	0.00	940000	35.75	33602000.00	71663298	33.51	2401294126.30	37550843	33.88	1272293640.50	32.33	1214144757.27	34112455	34.80	1187149369.03

Realized Capital gain(loss)per unit	1.55	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	4.79%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	5,81,48,883.23	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (27-10-2021)	38.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	3.50	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	10.05%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	11,93,57,657.47	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 71,663,298 shares and sold 37,550,843 shares of "NRBCBANK" from both public and block market during the period from 07.10.2021 to 27.10.2021. With their 21 (Twenty-One) BO accounts, Mr. Md. Abul Khayer and his associates jointly traded 53.38% shares of "NRBCBANK" during the investigation period and realized a capital gain of Tk. 58,148,883.23 from the trading of shares of "NRBCBANK" during the investigation period. It is also mentionable that they had significant amount of unrealized gain of Tk. 119,357,657.47.

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, -

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

(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;"

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

Contravention(s)-1:

Mr. Md. Abul Khayer 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 "NRBCBANK" creating an appearance of active trading therein and raising price of the said share.

Individual Trade Patterns and Gain & Loss of the other clients associated with Md. Abul Khayer:

- i) Individual Trade Patterns in public market, Effects of "NRBCBANK" at DSE in both public and block market by Konika Afroze (BOID # 1205590072553290, 1604530072553290 & 1605180073786062) and gain and loss statement are given below:

a) Individual Trade Patterns of Konika Afroze:

Date	Code # 7677				Code # 52194				Code # 50012				Total					
	BOID # 1205590072553290				BOID # 1604530072553290				BOID # 1605180073786062									
	KONIKA AFROZE				KONIKA AFROZE				KONIKA AFROZE									
	UCB Stock Brokerage Limited				SBL Capital Management Limited				Sonali Investment Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
Drag from this cell	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
17-10-2021	0	0.00	0	0.00	0	0.00	0	0.00	135150	32.97	0	0.00	135150	32.97	4455427.90	0	0.00	0.00
21-10-2021	0	0.00	0	0.00	139094	34.50	0	0.00	0	0.00	0	0.00	139094	34.50	4798663.00	0	0.00	0.00
24-10-2021	5820000	36.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5820000	36.35	211539608.40	0	0.00	0.00
26-10-2021	3200000	36.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3200000	36.00	115200000.00	0	0.00	0.00
Total	9020000		0		139094		0		135150		0		9294244			0		

- b) Effects of "NRBCBANK" at DSE in both public and block market by Konika Afroze:

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Date	Buy			Sale				Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Opening Balance										0	0.00	0.00						
Drag from this cell	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00%	0.00%	0.00%	0.00%
17-10-2021	135150	32.97	4455427.90	0	0.00	0.00	0	0.00	0.00	135150	32.97	4455427.90	23641354	34.20	8.23%	0.57%	0.00%	0.57%
21-10-2021	139094	34.50	4798663.00	0	0.00	0.00	0	0.00	0.00	274244	33.74	9254090.90	18015211	34.60	9.84%	0.77%	0.00%	0.77%
24-10-2021	5820000	36.35	211539608.40	0	0.00	0.00	0	0.00	0.00	6094244	36.23	220793699.30	20811126	36.00	4.05%	27.97%	0.00%	27.97%
26-10-2021	3200000	36.00	115200000.00	0	0.00	0.00	0	0.00	0.00	9294244	36.15	335993699.30	21279492	36.20	3.43%	15.04%	0.00%	15.04%
Total	9294244	36.15	335993699.30	0	0.00	0.00	0	0.00	0.00	9294244	36.15	335993699.30						

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
0	0.00	0.00	0	0.00	0.00	9294244	36.15	335993699.30	0	0.00	0.00	0.00	0.00	9294244	36.15	335993699.30

c) Gain and loss statement of Konika Afroze:

Realized Capital gain(loss)per unit	0.00	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	0.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	0.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (27-10-2021)	38.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	2.15	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	5.95%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	19975845.90	Quantity of Stock Position x Unrealized gain (loss) per unit

Counter-Party Trades:

Observations – 1:

As per DSE trade data, it was observed that **Konika Afroze (Client code # S50012 & BOID # 1605180073786062 of Sonali Investment Limited)** bought total 36,430 shares of "NRBCBANK" from her father named **Mr. Abul Kalam Matber (Client code # ABM663 & BOID # 1605110073447222 of Agrani Equity & Investment Limited)** through 3(Three) Howlas and the details of the mentioned trades are as follows:

Table: Counter-party trade between Konika Afroze and Mr. Abul Kalam Matber:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOLD BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOLD SELLER	MARKET TYPE
17/10/2021	11:02:48	220530781	NRBCBANK	8090	33	DSECB	KONIKA AFROZE	S50012	1605180073786062	DSECB	ABUL KALAM MATBER	ABM663	1605110073447222	Public
17/10/2021	11:04:47	220532535	NRBCBANK	18340	33	DSECB		S50012	1605180073786062	DSECB		ABM663	1605110073447222	Public
17/10/2021	11:24:11	220545589	NRBCBANK	10000	32.9	DSECB		S50012	1605180073786062	DSECB		ABM663	1605110073447222	Public

(DSE Trade Data)



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

Findings-1:

As per section 17(e)(ii) of the Bangladesh 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 security;"

Contravention-1:

Through the aforesaid activities, it appears that **Konika Afroze (BOID # 1605180073786062)** and **Mr. Abul Kalam Matber (BOID # 1605110073447222)** has violated **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 36,430 shares of "NRBCBANK" on 17/10/2021 by 3(Three) howlas creating a false and misleading appearance of active trading of shares of "NRBCBANK".

Observation - 2:

As per DSE trade data, it was found that **Konika Afroze (Client code # 7677 & BOID # 1205590072553290 of UCB Stock Brokerage Limited)** bought 31,52,169 shares of "NRBCBANK" from her brother **Md. Abul Khayer (Client code # ABM645 & BOID # 1605110071091116 of Agrani Equity & Investment Limited)** through 09(Nine) Howlas and the details of all the above mentioned trades are as follows:

Table: Counter-party trading of Konika Afroze and Md. Abul Khayer:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER NAME	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER NAME	SELLER CLIENT	BOID SELLER	MARKET TYPE
26/10/2021	14:04:57	221878348	NRBCBANK	390000	36	DSEUBR	KONIKA AFROZE	7677	1205590072553290	DSECB	MD. ABUL KHAYER	ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878352	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878353	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878354	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878355	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878356	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878357	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878358	NRBCBANK	390000	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public
26/10/2021	14:04:57	221878359	NRBCBANK	32169	36	DSEUBR		7677	1205590072553290	DSECB		ABM645	1605110071091116	Public

(DSE trade data)

Contravention(s)- 7:

Through the aforesaid activities, it appears that **Konika Afroze (BOID # 1205590072553290)** and **Md. Abul Khayer (BOID # 1605110071091116)** has violated **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969**, by effecting the transactions of 31,52,169 shares of "NRBCBANK" on 26/10/2021 by 09(Nine) howlas creating a false and misleading appearance of active trading of shares of "NRBCBANK".

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক সেপ্টেম্বর ০৭, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩০৮৫(পার্ট-২)/২০২১/১১৮৬ স্মারকমূলে Md. Abul Khayer and his associates (associates are Md. Abul Khayer, Mr. Abul Kalam Matber, Aleya Begum, Kazi Sadia Hasan, Sajed Madbar, Mohammad Basher, Konika Afroze, Monarch Holdings Limited, D I T Co-Operative Ltd.)-কে সেপ্টেম্বর ১৮, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। শুনানীতে Mrs. Konika Afroze এর পক্ষে Mr. Md. Abul Khayer উপস্থিত হয়ে সেপ্টেম্বর ১৮, ২০২২ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With due respect, I, Md. Abul Khayer hereby would like to take the opportunity to explain my position in respect of your letter no. # BSEC/Enforcement/3085(part-2)/2021/1186 dated September 07, 2022 regarding NRBC.

Pursuant to your above-mentioned letter, we have tried to trade significant quantity of shares to improve the market scenario and increase the market volume in the very difficult situation like COVID19 hit the capital market significantly where market volume reduced to very low and capital market was depressed and volume was required to stabilize the market. We, all know that the current economic data shows significant growth trajectory of Bangladesh Economy under the daughter of Bangabandhu HH Prime Minister Sheikh Hasina M.P., the depressed situation of capital market will not sustain, it must be rebounded significantly. It needs leader with good number of market participants who will work for the development of market like existing Chairman sir along with his team of BSEC.

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

Subsequently we have made huge loss due to long bearish trend of market in last couple of months. We have purchased shares by taking margin loan from merchant banks or brokerage houses that incurred significantly financial charges that ultimately increases the loss for us. 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.

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."



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

যেহেতু, Mrs. Konika Afroze -এর উল্লিখিত বস্ত্রব্য এবং তদন্ত প্রতিবেদন পর্যালোচনা থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকাণ্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mrs. Konika Afroze -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

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

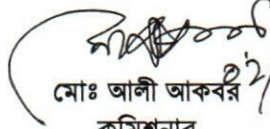
যেহেতু, Mrs. Konika Afroze -এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

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

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

- Mrs. Konika Afroze-কে ১.০০ (এক) লক্ষ টাকা অর্থদণ্ড ধার্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Mrs. Konika Afroze

(BOID: 1205590072553290, 1604530072553290

1605180073786062)

54 no Dinara, PO: Old Noria

Shariatpur-8020.