

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

নং-বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/৮৫৬

তারিখঃ নভেম্বর ০৪, ২০২৪

MS. MARJANA RAHMAN

(BO ID: 1605400071967130, 1201930071967130)

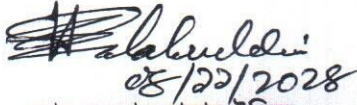
Navana Condominium, 76, Segunbagicha,

Flat-1B, Ramna, Dhaka.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/৮৫৫ তারিখঃ নভেম্বর ০৪, ২০২৪ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,



মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

IP PABX: 88-02-09609-100600, Ext- 1220

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/MSI/2021-1009/Vol-2 dated 19.09.2022]
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/৩৩৫৭/২০২২/৮৫৫

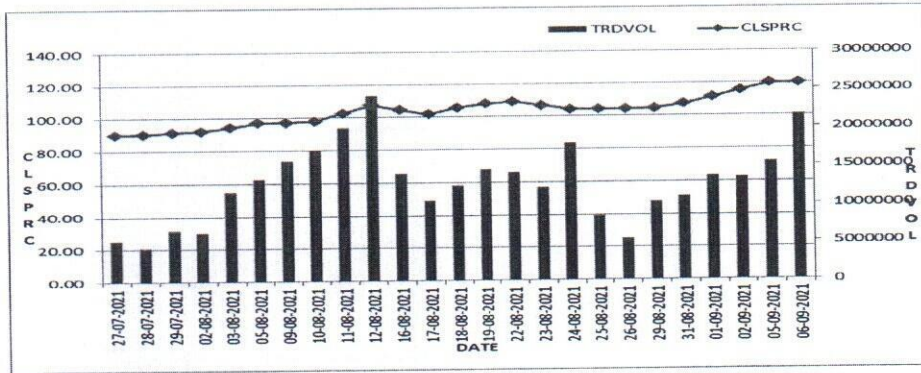
তারিখঃ নভেম্বর ০৪, ২০২৪

আদেশ

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

যেহেতু, সেপ্টেম্বর ১২, ২০২১ তারিখের DSE Surveillance Note # 055/2021 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 ২৮.০৭.২০২১ থেকে ০৬.০৯.২০২১ পর্যন্ত সময়কালে Bangladesh Export Import Company Ltd. (BEXIMCO)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

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



YCP of BEXIMCO as on 28-07-2021 was Tk. 90.00 and closing price of the same was Tk. 119.80 as on 06-09-2021. During this period the investigation team found that the price of BEXIMCO share was increased by Tk. 29.80 which is approximately 33.11% higher compared to Close Price of 27-07-2021.

Tradenext International Ltd. & Marjana Rahman:

Observation-1:

Tradenext International Ltd. (client code # J3531 & BOID # 1605400072217023 of Janata Capital and Investment Limited (traded through ICB Securities Trading Company Limited)) was the top most buyer of shares of "BEXIMCO" from the period of 28.07.2021 to 06.09.2021. After examining the relevant documents, it was also observed that the said client participated in trading of shares of "BEXIMCO" in association with total 03 (Three) accounts and the details of the same are delineated as follows:

S.L.	Client Name	Client Code	BO ID	Name of Depository Participant	Remarks
1	TRADENEXT INTERNATIONAL LTD.	J3531	1605400072217023	Janata Capital and Investment Limited	Single Account
2	MARJANA RAHMAN	J3462	1605400071967130	Janata Capital and Investment Limited	Marjana Rahman is the Director and operator of Tradenext International Ltd.
3	MARJANA RAHMAN	dhn8735	1201930071967130	Beximco Securities Limited	

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

1. Trade Pattern, effects of the BEXIMCO at DSE and Gain and Loss by Tradenext International Ltd. & Marjana Rahman are given below:

a) Trade Pattern of Tradenext International Ltd. & Marjana Rahman (Public Market):

Date	Code # J3462				Code # dhn8735				Code # J3531				Total					
	BO ID # 1605400071967130				BO ID # 1201930071967130				BO ID # 1605400072217023									
	MARJANA RAHMAN				MARJANA RAHMAN				TRADENEXT INTERNATIONAL LTD.									
	Janata Capital and Investment Limited				Beximco Securities Limited				Janata Capital and Investment Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
16-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	2812165	104.51	0	0.00	2812165	104.51	293911202.80	0	0.00	0.00
18-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	3133307	104.99	0	0.00	3133307	104.99	328954072.90	0	0.00	0.00
19-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	6933552	107.36	0	0.00	6933552	107.36	744410015.30	0	0.00	0.00
22-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	7814893	108.77	0	0.00	7814893	108.77	850058972.40	0	0.00	0.00
23-08-2021	0	0.00	0	0.00	0	0.00	0	0.00	4393059	107.54	0	0.00	4393059	107.54	472417709.90	0	0.00	0.00
24-08-2021	3608977	104.33	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3608977	104.33	376524504.30	0	0.00	0.00
25-08-2021	0	0.00	0	0.00	0	0.00	370411	103.89	0	0.00	0	0.00	0	0.00	0.00	370411	103.89	38482744.00
26-08-2021	3066533	104.02	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3066533	104.02	318967981.70	0	0.00	0.00
29-08-2021	793633	104.78	0	0.00	0	0.00	330	104.90	0	0.00	0	0.00	793633	104.78	83157869.60	330	104.90	34617.00
02-09-2021	166405	115.75	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	166405	115.75	19261165.10	0	0.00	0.00
05-09-2021	156985	119.33	0	0.00	0	0.00	0	0.00	5476555	118.53	0	0.00	5633540	118.55	667883446.40	0	0.00	0.00
06-09-2021	1185374	120.07	1183891	120.07	0	0.00	0	0.00	0	0.00	0	0.00	1185374	120.07	142330566.70	1183891	120.07	142146931.10
Total	8977907		1183891		0		370741		30563531		0		39541438			1554632		

Client's Total Trade	41505970
Total Vol. of period	317050264
Percentage of Trade	13.09%
Percentage of Share Holding	9.98%

b) Effects of "BEXIMCO" at DSE (both block & public Market) by Tradenext International Ltd. & Marjana Rahman:

Opening Balance: 20,997,255

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 (%)
Opening Balance										49367996	80.62	3979876969.21						
16-8-21	2812165	104.51	293911202.80	0	0.00	0.00	0	0.00	0.00	52180161	81.90	4273788172.01	14488814	104.50	-2.79%	19.41%	0.00%	19.41%
18-8-21	3133307	104.99	328954072.90	0	0.00	0.00	0	0.00	0.00	55313468	83.21	4602742244.91	12520413	105.60	3.83%	25.03%	0.00%	25.03%
19-8-21	6933552	107.36	744410015.30	0	0.00	0.00	0	0.00	0.00	62247020	85.90	5347152260.21	14530285	107.90	2.18%	47.72%	0.00%	47.72%
22-8-21	7814893	108.77	850058972.40	0	0.00	0.00	0	0.00	0.00	70061913	88.45	6197211232.61	14143135	109.10	1.11%	55.26%	0.00%	55.26%
23-8-21	4393059	107.54	472417709.90	0	0.00	0.00	0	0.00	0.00	74454972	89.58	6669628942.51	12147748	106.60	-2.29%	36.16%	0.00%	36.16%
24-8-21	3708877	104.67	388212804.30	0	0.00	0.00	0	0.00	0.00	78163849	90.30	7057841746.81	18011198	104.30	-2.16%	20.59%	0.00%	20.59%
25-8-21	0	0.00	0.00	370411	103.89	38482744.00	0	90.30	33446436.59	77793438	90.30	7024395310.22	8397620	104.10	-0.19%	0.00%	4.41%	4.41%
26-8-21	3066533	104.02	318967981.70	0	0.00	0.00	0	0.00	0.00	80859971	90.82	7343363291.92	5391773	104.10	0.00%	56.87%	0.00%	56.87%
29-8-21	793633	104.78	83157869.60	330	104.90	34617.00	0	90.95	30014.01	81653274	90.95	7426491147.51	10302645	104.60	0.48%	7.70%	0.00%	7.71%
2-9-21	166405	115.75	19261165.10	0	0.00	0.00	0	0.00	0.00	81819679	91.00	7445752312.61	13640815	115.60	3.86%	1.22%	0.00%	1.22%
5-9-21	5633540	118.55	667883446.40	0	0.00	0.00	0	0.00	0.00	87453219	92.78	8113635759.01	15476789	119.80	3.63%	36.40%	0.00%	36.40%
6-9-21	1185374	120.07	142330566.70	1493891	117.56	175626931.10	0	93.14	139143835.35	87144702	93.14	8116822490.36	22108710	119.80	0.00%	5.36%	6.76%	12.12%
Total	39641338	108.71	4309565807.10	1864632	114.85	214144292.10	0	92.58	172620285.95	87144702	93.14	8116822490.36						

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

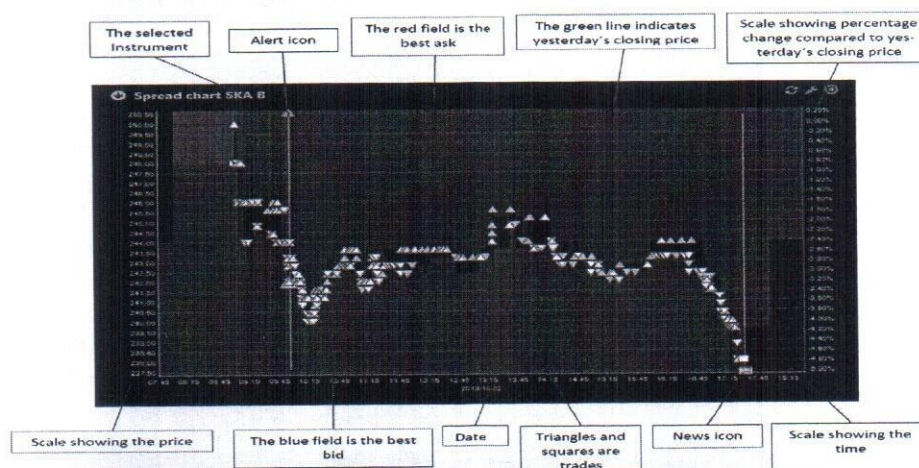
www.sec.gov.bd

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
99900	117.00	11688300.00	310000	108.00	33480000.00	39641338	108.71	4309565807.10	1864632	114.85	214144292.10	92.58	172620285.95	87144702	93.14	8116822490.36

c) Trade monitoring screenshots based on public market trade of BEXIMCO by Tradenext International Ltd. & Marjana Rahman:

IED collected Trade monitoring screenshots from Surveillance Department on some trading dates where appearance of active trading of Tradenext International Ltd. & Marjana Rahman was observed which influenced the price of BEXIMCO.

The details of the graphs are given below:



▲ Green triangle represents trade of BEXIMCO by Tradenext International Ltd. & Marjana Rahman

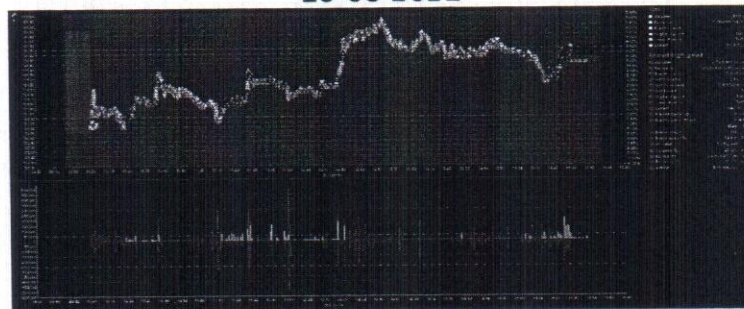


White triangle represents trade of BEXIMCO by other clients

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Tradenext International Ltd. & Marjana Rahman were involved in trading of shares of BEXIMCO which influenced price of the said shares on several dates:

1605400071967130, 1201930071967130, 1605400072217023 (combined)

18-08-2021



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

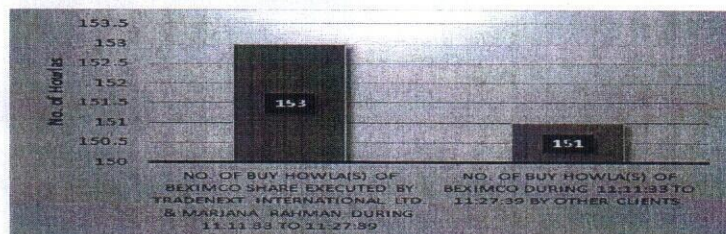
www.sec.gov.bd

It was observed in the above graph that on 18-08-2021, total number of trades of BEXIMCO in the market was 5348, whereas number of trades (buy) executed by Tradenext International Ltd. & Marjana Rahman were 779 which is approximately 14.57% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 12,410,313 whereas buy volume by the said client(s) was 3,133,307 which is approximately 25.25% of the total traded volume in the market. It is evident that the client had significant participation in the market on 18-08-2021 in trading of BEXIMCO share.

On 18-08-2021, trading of BEXIMCO share was started at Tk. 103.00 which is Tk. 1.30 more than the YCP of Tk. 101.70. On that day, Tradenext International Ltd. & Marjana Rahman started series of trading at 11:11:33 at price Tk. 103.20 and induced the same to rise to Tk. 104.40 up to 11:27:39. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 11:11:33 to 11:27:39, Tradenext International Ltd. & Marjana Rahman bought 626,611 shares of BEXIMCO compared to the total traded share of 837,331. This is shown in the following Pie Chart.

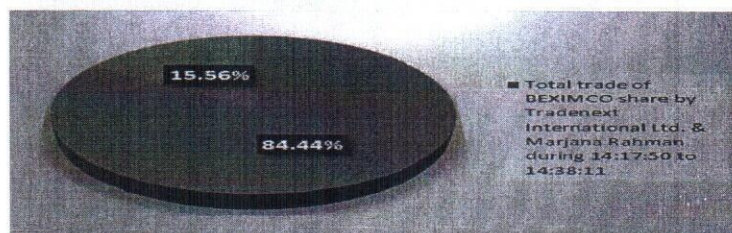


It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 153 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 304 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 74.83% of the total trades of BEXIMCO shares by executing 153 of total 304 howlas from 11:11:33 to 11:27:39 on 18-08-2021. From 11:11:33 to 11:27:39, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 103.20 to Tk. 104.40. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share.

On 18-08-2021, again Tradenext International Ltd. & Marjana Rahman started series of trading at 14:17:50 at price Tk. 105.00 and induced the same to rise to Tk. 105.60 up to 14:38:11. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 14:17:50 to 14:38:11, Tradenext International Ltd. & Marjana Rahman bought 891,620 shares of BEXIMCO compared to the total traded share of 1,055,904. This is shown in the following Pie Chart.



Bangladesh Securities and Exchange Commission

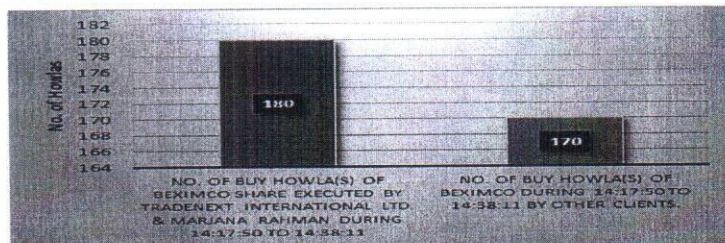
Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

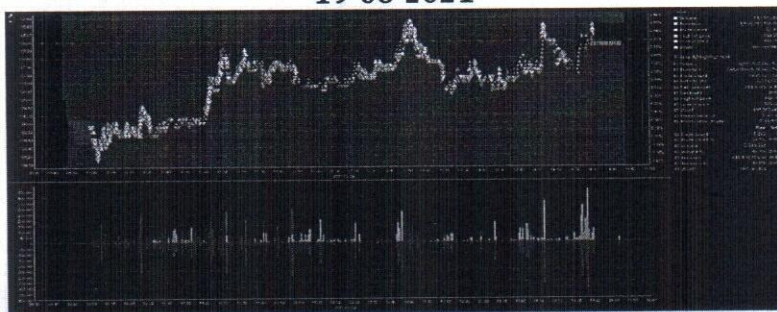
www.sec.gov.bd

It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 180 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 350 as shown in the following Bar Chart.



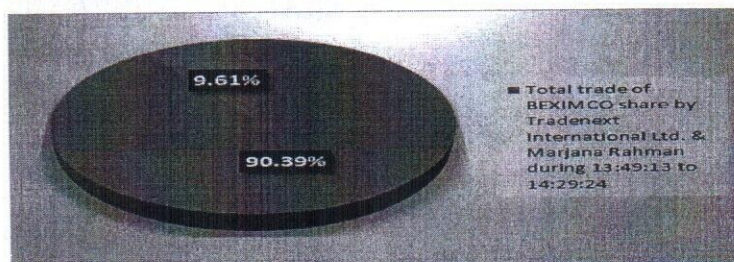
It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 84.44% of the total trades of BEXIMCO shares by executing 180 of total 350 howlas from 14:17:50 to 14:38:11 on 18-08-2021. From 14:17:50 to 14:38:11, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 105.00 to Tk. 105.60. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 3.90 which is approximately 3.83% higher than YCP.

19-08-2021



It was observed in the above graph that on 19-08-2021, total number of trades of BEXIMCO in the market was 5993, whereas number of trades (buy) executed by Tradenext International Ltd. & Marjana Rahman were 1875 which is approximately 31.29% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 14,530,285 whereas buy volume by the said client(s) was 6,933,552 which is approximately 47.72% of the total traded volume in the market. It is evident that the client had significant participation in the market on 19-08-2021 in trading of BEXIMCO share.

On 19-08-2021, trading of BEXIMCO share was started at Tk. 105.90 which is Tk. 0.30 more than the YCP of Tk. 105.60. On that day, Tradenext International Ltd. & Marjana Rahman started series of trading at 13:49:13 at price Tk. 107.30 and induced the same to rise to Tk. 108.10 up to 14:29:24. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 13:49:13 to 14:29:24, Tradenext International Ltd. & Marjana Rahman bought 3,157,554 shares of BEXIMCO compared to the total traded share of 3,493,437. This is shown in the following Pie Chart.



Bangladesh Securities and Exchange Commission

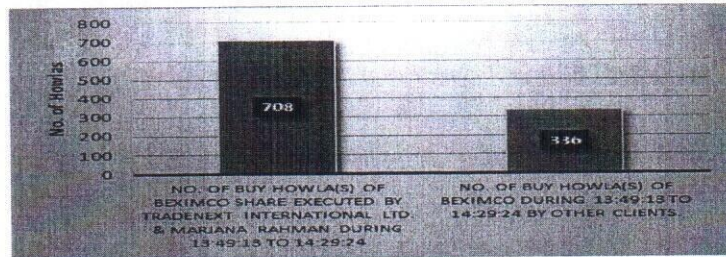
Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

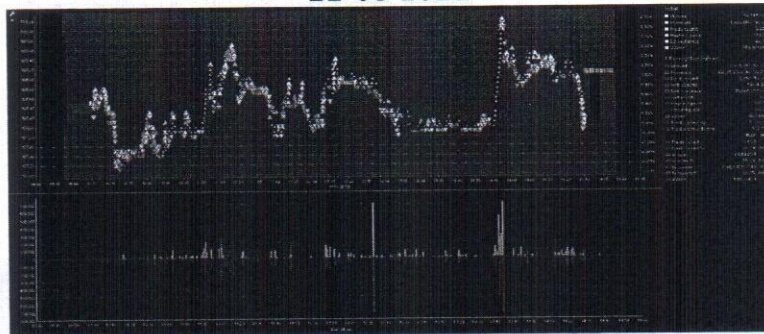
www.sec.gov.bd

It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 708 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 1,044 as shown in the following Bar Chart.



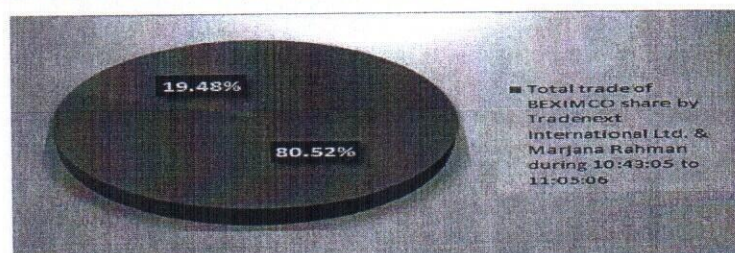
It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 90.39% of the total trades of BEXIMCO shares by executing 708 of total 1,044 howlas from 13:49:13 to 14:29:24 on 19-08-2021. From 13:49:13 to 14:29:24, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 107.30 to Tk. 108.10. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 2.30 which is approximately 2.18% higher than YCP.

22-08-2021



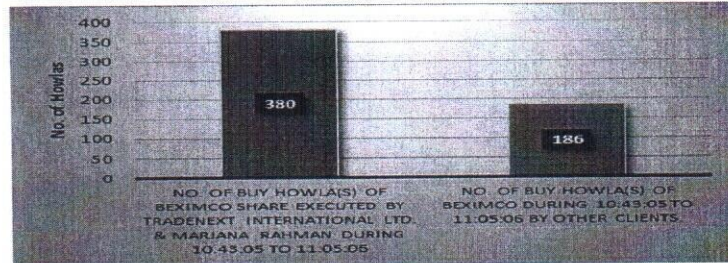
It was observed in the above graph that on 22-08-2021, total number of trades of BEXIMCO in the market was 5235, whereas number of trades (buy) executed by Tradenext International Ltd. & Marjana Rahman were 1850 which is approximately 35.34% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 14,143,135 whereas buy volume by the said client(s) was 7,814,893 which is approximately 55.26% of the total traded volume in the market. It is evident that the client had significant participation in the market on 22-08-2021 in trading of BEXIMCO share.

On 22-08-2021, trading of BEXIMCO share was started at Tk. 108.50 which is Tk. 0.60 more than the YCP of Tk. 107.90. On that day, Tradenext International Ltd. & Marjana Rahman started series of trading at 10:43:05 at price Tk. 107.90 and induced the same to rise to Tk. 109.20 up to 11:05:06. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 10:43:05 to 11:05:06, Tradenext International Ltd. & Marjana Rahman bought 1,104,138 shares of BEXIMCO compared to the total traded share of 1,371,287. This is shown in the following Pie Chart.



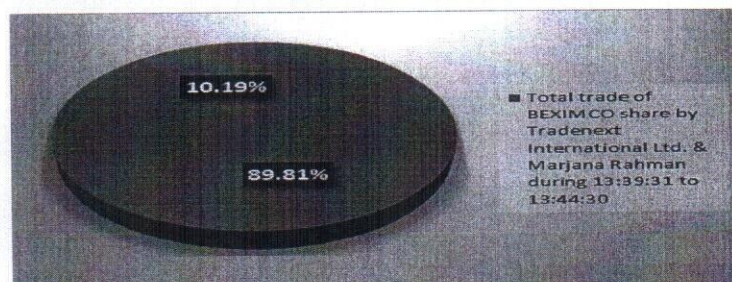
Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 380 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 566 as shown in the following Bar Chart.

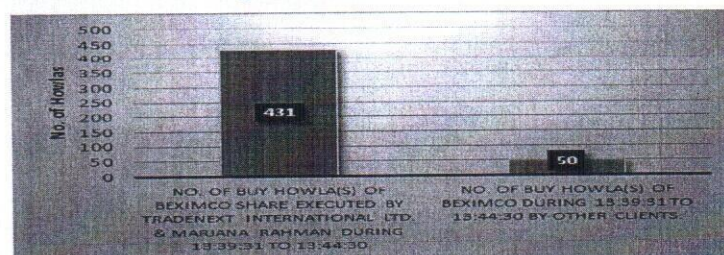


It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 80.52% of the total trades of BEXIMCO shares by executing 380 of total 566 howlas from 10:43:05 to 11:05:06 on 22-08-2021. From 10:43:05 to 11:05:06, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 107.90 to Tk. 109.20. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share.

On 22-08-2021, again Tradenext International Ltd. & Marjana Rahman started series of trading at 13:39:31 at price Tk. 108.00 and induced the same to rise to Tk. 109.90 up to 13:44:30. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 13:39:31 to 13:44:30, Tradenext International Ltd. & Marjana Rahman bought 2,081,170 shares of BEXIMCO compared to the total traded share of 2,317,296. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 431 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 481 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 89.81% of the total trades of BEXIMCO shares by executing 431 of total 481 howlas from 13:39:31 to 13:44:30 on 22-08-2021. From 13:39:31 to 13:44:30, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 108.00 to Tk. 109.90. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share was increased by Tk. 1.20 which is approximately 1.11% higher than YCP.

[Signature]

Bangladesh Securities and Exchange Commission

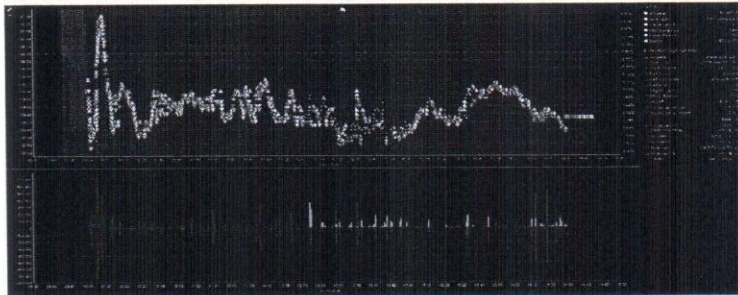
Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

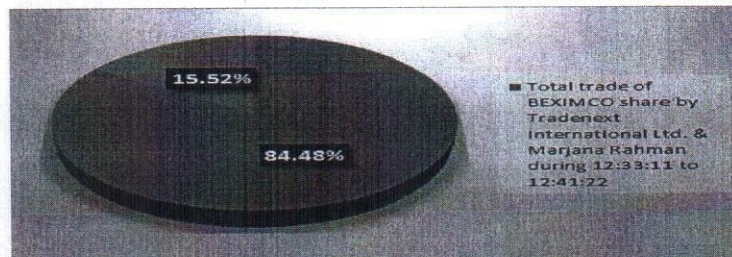
www.sec.gov.bd

24-08-2021

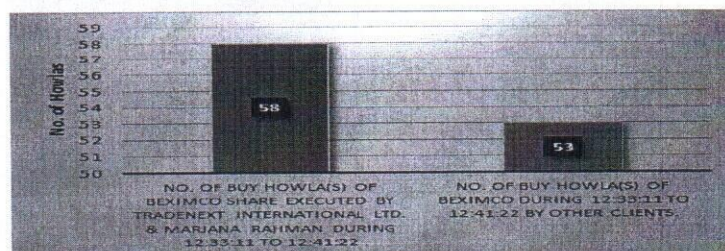


It was observed in the above graph that on 24-08-2021, total number of trades of BEXIMCO in the market was 5797, whereas number of trades (buy) executed by Tradenext International Ltd. & Marjana Rahman were 608 which is approximately 10.49% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 17,911,298 whereas buy volume by the said client(s) was 3,608,977 which is approximately 20.15% of the total traded volume in the market. It is evident that the client had significant participation in the market on 24-08-2021 in trading of BEXIMCO share.

On 24-08-2021, trading of BEXIMCO share was started at Tk. 105.00 which is Tk. 1.60 less than the YCP of Tk. 106.60. On that day, Tradenext International Ltd. & Marjana Rahman started series of trading at 12:33:11 at price Tk. 103.60 and induced the same to rise to Tk. 104.50 up to 12:41:22. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 12:33:11 to 12:41:22, Tradenext International Ltd. & Marjana Rahman bought 291,138 shares of BEXIMCO compared to the total traded share of 344,643. This is shown in the following Pie Chart.



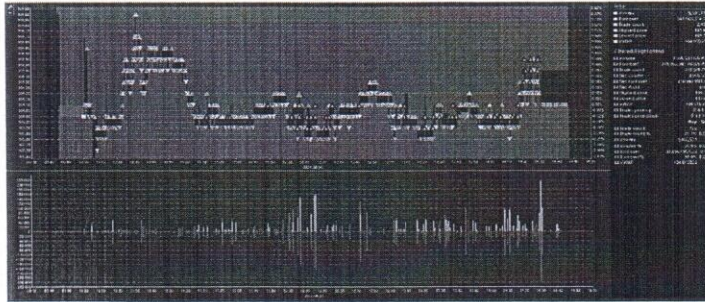
It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 58 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 111 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 84.48% of the total trades of BEXIMCO shares by executing 58 of total 111 howlas from 12:33:11 to 12:41:22 on 24-08-2021. From 12:33:11 to 12:41:22, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 103.60 to Tk. 104.50. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share.

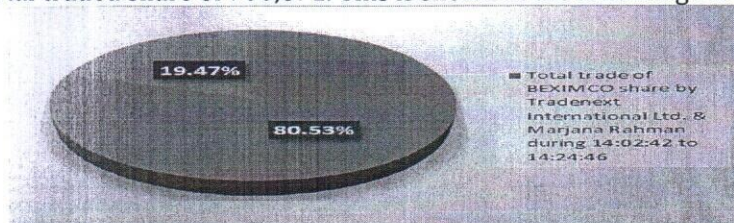
Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
www.sec.gov.bd

26-08-2021

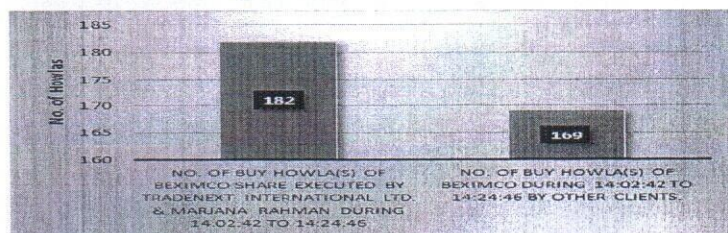


It was observed in the above graph that on 26-08-2021, total number of trades of BEXIMCO in the market was 2452, whereas number of trades (buy) executed by Tradenext International Ltd. & Marjana Rahman were 728 which is approximately 29.69% of the total number of trades in the market. Again, total traded volume of BEXIMCO in the market on that day was 5,391,773 whereas buy volume by the said client(s) was 3,066,533 which is approximately 56.87% of the total traded volume in the market. It is evident that the client had significant participation in the market on 26-08-2021 in trading of BEXIMCO share.

On 26-08-2021, trading of BEXIMCO share was started at Tk. 104.00 which is Tk. 0.10 less than the YCP of Tk. 104.10. On that day, Tradenext International Ltd. & Marjana Rahman started series of trading at 14:02:42 at price Tk. 104.00 and induced the same to rise to Tk. 104.50 up to 14:24:46. It can also be observed from the above graph that Tradenext International Ltd. & Marjana Rahman executed significant trades during this time period. It is mentionable here that from 14:02:42 to 14:24:46, Tradenext International Ltd. & Marjana Rahman bought 564,440 shares of BEXIMCO compared to the total traded share of 700,871. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Tradenext International Ltd. & Marjana Rahman executed 182 howlas to purchase of shares of BEXIMCO compared to the total number of howlas of 351 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Tradenext International Ltd. & Marjana Rahman bought 80.53% of the total trades of BEXIMCO shares by executing 182 of total 351 howlas from 14:02:42 to 14:24:46 on 26-08-2021. From 14:02:42 to 14:24:46, Tradenext International Ltd. & Marjana Rahman induced the price to rise from Tk. 104.00 to Tk. 104.50. Thus it seems that Tradenext International Ltd. & Marjana Rahman were actively trying to lift the price of BEXIMCO share. At the end of the day price of BEXIMCO share remains the same as the YCP.

[Signature]

Bangladesh Securities and Exchange Commission

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

d) Gain and Loss by Tradenext International Ltd. & Marjana Rahman from 28.07.2021 to 06.09.2021:

Realized Capital gain(loss)per unit	22.27	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	24.06%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	41,524,006.15	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (06-09-2021)	119.80	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	26.66	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	28.62%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	2,323,112,809.24	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data, Tradenext International Ltd. & Marjana Rahman bought 39,641,338 shares and sold 1,864,632 shares of "BEXIMCO" from both block and public market during the period from 28.07.2021 to 06.09.2021 with their 03 (three) BO accounts. With the said 03 (three) accounts Tradenext International Ltd. & Marjana Rahman collectively traded 13.09% of total trade volume and realized a capital gain of Tk. 41,524,006.15 from the trading of "BEXIMCO" share during the investigation period. It is also mentionable that this group of clients had significant amount of unrealized gain of Tk. 2,323,112,809.24.

Findings:

As per **Section 17(e)(v) 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 inducing its purchase by others or depressing its price for the purpose of inducing its sale by others;"

Hence, it is observed from the aforesaid discussion that Tradenext International Ltd. & Marjana Rahman were involved directly and indirectly in a series of transaction of share of 'BEXIMCO' in order to create the appearance of active trading of the said share.

Contraventions:

It appears that **Tradenext International Ltd.** (BOID # 1605400072217023) & **Marjana Rahman** (BOID # 1605400071967130 & 1201930071967130) have violated the following-

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

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

*****The individual Trade Pattern, combined effect of the trades in the market and individual Gain/Loss of Marjana Rahman.**

a) Individual Trade Pattern of MARJANA RAHMAN: (Public Market)

Date	Code # J3462				Code # dhn8735				Total					
	BO ID # 1605400071967130				BO ID # 1201930071967130									
	MARJANA RAHMAN				MARJANA RAHMAN									
	Janata Capital and Investment Limited				Beximco Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
24-08-2021	3608977	104.33	0	0.00	0	0.00	0	0.00	3608977	104.33	376524504.30	0	0.00	0.00
25-08-2021	0	0.00	0	0.00	0	0.00	370411	103.89	0	0.00	0.00	370411	103.89	38482744.00
26-08-2021	3066533	104.02	0	0.00	0	0.00	0	0.00	3066533	104.02	318967981.70	0	0.00	0.00
29-08-2021	793633	104.78	0	0.00	0	0.00	330	104.90	793633	104.78	83157869.60	330	104.90	34617.00
02-09-2021	166405	115.75	0	0.00	0	0.00	0	0.00	166405	115.75	19261165.10	0	0.00	0.00
05-09-2021	156985	119.33	0	0.00	0	0.00	0	0.00	156985	119.33	18732779.00	0	0.00	0.00
06-09-2021	1185374	120.07	1183891	120.07	0	0.00	0	0.00	1185374	120.07	142330566.70	1183891	120.07	142146931.10
Total	8977907		1183891		0		370741		8977907			1554632		

b) Effects of "BEXIMCO" at DSE (both block & public market) by MARJANA RAHMAN:

Opening Balance: 49,367,996

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										49367996	80.62	3979876969.21						
24-8-21	3708877	104.67	388212804.30	0	0.00	0.00	0	0.00	0.00	53076873	82.30	4368089773.51	18011198	104.30	-2.16%	20.59%	0.00%	20.59%
25-8-21	0	0.00	0.00	370411	103.89	38482744.00	0	82.30	30483870.09	52706462	82.30	4337605903.42	8397620	104.10	-0.19%	0.00%	4.41%	4.41%
26-8-21	3066533	104.02	318967981.70	0	0.00	0.00	0	0.00	0.00	55772995	83.49	4656573885.12	5391773	104.10	0.00%	56.87%	0.00%	56.87%
29-8-21	793633	104.78	83157869.60	330	104.90	34617.00	0	83.79	27650.78	56566298	83.79	4739704103.94	10302645	104.60	0.48%	7.70%	0.00%	7.71%
2-9-21	166405	115.75	19261165.10	0	0.00	0.00	0	0.00	0.00	56732703	83.88	4758965269.04	13640815	115.60	3.86%	1.22%	0.00%	1.22%
5-9-21	156985	119.33	18732779.00	0	0.00	0.00	0	0.00	0.00	56889688	83.98	4777698048.04	15476789	119.80	3.63%	1.01%	0.00%	1.01%
6-9-21	1185374	120.07	142330566.70	1493891	117.56	175626931.10	0	84.72	126560114.00	56581171	84.72	4793468500.74	22108710	119.80	0.00%	5.36%	6.76%	12.12%
Total	9077807	106.93	970663166.40	1864632	114.85	214144292.10	0	84.24	157071634.87	56581171	84.72	4793468500.74						

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
99900	117.00	11688300.00	310000	108.00	33480000.00	9077807	106.93	970663166.40	1864632	114.85	214144292.10	84.24	157071634.87	56581171	84.72	4793468500.74

Individual Gain or Loss by Marjana Rahman from BEXIMCO during 28.07.2021 to 06.09.2021:

Financial Parameter	Marjana Rahman	Details
Realized Capital gain(loss)per unit	30.61	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	36.34%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	5,70,72,657.23	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (06-09-2021)	119.80	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	35.08	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	41.41%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	198,49,55,785.06	Quantity of Stock Positon x Unrealized gain (loss) per unit

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 ডিসেম্বর ১২, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৩৫৭/২০২২/১৬৪০ স্মারকমূলে MS. MARJANA RAHMAN -কে ডিসেম্বর ২২, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত তারিখ মার্চ ১৯, ২০২৩-এ MS. MARJANA RAHMAN এর পক্ষে Mr. Md. Elias Mia শুনানীতে উপস্থিত হয়ে মার্চ ১৬, ২০২৩ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"with due respect I would like to state that I Marzana Rahman involved in stock market since January 01, 2011 and maintaining following BO Accounts with different Brokerage houses in my name, family members & associates:

Sl. No.	Client Name	BO ID	Name of the TREC Holder	Relation
01	Marzana Rahman	1201930071967130	Beximco Securities Ltd.	self
02	Marzana Rahman	1605400071967130	Janata Capital & Inv. Ltd.	self
03	Marzana Rahman	1205790071967130	Fareast Life Securities	Self
04	Tradenext Int. Ltd.	1201930072217023	Beximco Securities Ltd.	Director
05	Red Sea International Ltd.	1201930025940576	Beximco Securities Ltd.	Director
06	Tradenext Int. Ltd.	1605400072217023	Janata Capital & Inv. Ltd.	Director
07	Tradenext International Ltd.	1203680072217023	IDLC Securities Ltd.	Director

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

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

Please note that, since I have started investing in secondary market I have realized & unrealized profit (loss) of BDT 2,841,435,719.00 and BDT (31,891,409.00) in the following client codes (Personal) respectively:

Sl. No.	Client Name	BO ID	Realized profit & Loss (Tk)
01	Marzana Rahman	1201930071967130	2,030,267,390.97
02	Marzana Rahman	1605400071967130	894,125,642.49
03	Marzana Rahman	1205790071967130	(43,906,422.87)
04	Tradenext Int. Ltd.	1201930072217023	(204,821,311.11)
05	Red Sea International Ltd.	1201930025940576	150,820,845.31
06	Tradenext Int. Ltd.	1605400072217023	(70,571,195.55)
07	Tradenext International Ltd.	1203680072217023	282,713.17

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

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



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

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

যেহেতু, MS. MARJANA RAHMAN -উপর্যুক্ত কর্মকাণ্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লংঘন করেছেন;

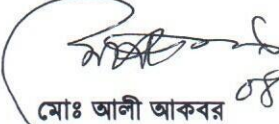
যেহেতু, MS. MARJANA RAHMAN-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

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

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

- MS. MARJANA RAHMAN-কে মোট ৫.০০ (পাঁচ) কোটি টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

- ১। MS. MARJANA RAHMAN
(BO ID: 1605400071967130 and 1201930071967130)
Navana Condominium, 76, Segunbagicha,
Flat-1B, Ramna, Dhaka.