

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬২৫

তারিখঃ এপ্রিল ২২, ২০২৫

UDC Construction Ltd.

(BOID: 1203110068826218, 1203260068826218,
1205660068826218, 1201950064794179, 1202550064794179,
1204780064794179, 1206470064794179, 1602170064794179
and 1605170064794179)

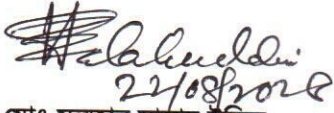
House No: B-104, Road: 08,

New DOHS Mohakhali, Dhaka-1212.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬২৫ তারিখঃ এপ্রিল ২২, ২০২৫ 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।
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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তারিখঃ এপ্রিল ২২, ২০২৪

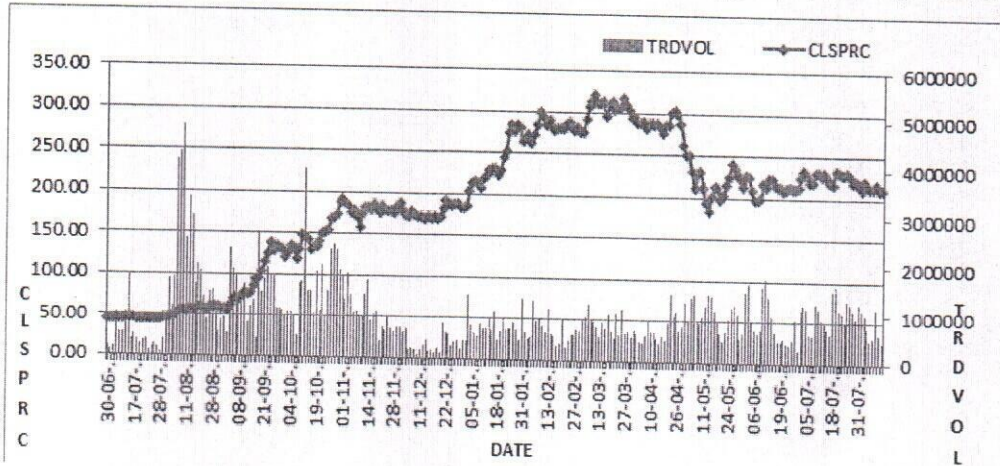
আদেশ

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, আগস্ট ২৩, ২০২৩ ও আগস্ট ২৪, ২০২৩ তারিখের কমিশনের অনুসন্ধান (Enquiry) আদেশ নং BSEC/IE & ID/Enquiry/2023/08/111 এবং BSEC/IE & ID/Enquiry/2023/08/114 দ্বারা প্রদত্ত ক্ষমতাবলে কমিশন Sea Pearl Beach Resort and Spa Limited (SEAPEARL) এর শেয়ার লেনদেনে সম্ভাব্য মূল্যকায়ম সনাক্ত করে অনুসন্ধান কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Description of alleged violation of securities laws:

Whereas, pursuant to Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/111 dated August 23, 2023 and Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/114 dated August 24, 2023 the Commission formed an enquiry committee to enquire regarding the possible price manipulation activities of the share of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) by the parties including individuals, stock brokers, stock dealer, and institutions; identification of the Insider Trading of the said company and all other relevant issues. The enquiry committee enquired share trading of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) for the period from 01.07.2022 to 10.08.2023 and prepared a report. From the enquiry report it appears, among others, that:



The Yesterday Closing Price (YCP) change in the price of SEAPEARL shares from 01/07/2022 to 10/08/2023 has been substantial. The details are as follows:

- The opening price of SEAPEARL shares on 01/07/2022 was Tk. 43.70.
- The closing price of SEAPEARL shares on 10/08/2023 was Tk. 211.00.

During this period:

- The price of SEAPEARL shares increased by Tk. 167.30.

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

www.sec.gov.bd

- This represents an impressive YCP increase of approximately 382.84% compared to the closing price on 30.06.2022.

This significant percentage increase indicates substantial market movement and investor interest in SEAPEARL shares during the specified period.

MD. KALAM HOSSAIN and his associates:

After a thorough examination of Customer Account Information forms and documents obtained from the company and various TREC holders, it has been noted that the following group of clients are affiliated in the following ways:

SL	BOLD	Client Code	Client's Name	Name of Depository Participant	Remarks
1	1203980064815749	03923	MD. KALAM HOSSAIN	NBL Securities Limited	Single Account
2	1203110068826218	37443	UDC CONSTRUCTION LIMITED	United Financial Trading Company Limited	Md. Kalam Hossain is the Managing Director of UDC Construction Limited.
3	1203260068826218	102955	UDC CONSTRUCTION LIMITED	MIKA Securities Limited	
4	1205660068826218	1750	UDC CONSTRUCTION LIMITED	Trust Bank Securities Limited	
5	1201950064794179	46314	UDC CONSTRUCTION LTD.	EBL Securities Limited	
6	1202550064794179	C299	UDC CONSTRUCTION LTD.	Sheltech Brokerage Limited	
7	1204780064794179	D3690	UDC CONSTRUCTION LTD.	United Securities Limited	
8	1206470064794179	1553	UDC CONSTRUCTION LTD.	NY Trading Limited	
9	1602170064794179	5634	UDC CONSTRUCTION LTD.	Mercantile Bank Securities Ltd	
10	1605170064794179	CM850	UDC CONSTRUCTION LTD.	City Bank Capital Resources Limited	
11	1204780064808689	D3685	VENUS BUILDERS LTD.	United Securities Limited	Md. Kalam Hossain is the Managing Director of Venus Builders Ltd.
12	1205590064808689	12174	VENUS BUILDERS LTD.	UCB Stock Brokerage Limited	
13	1205660064808689	1751	VENUS BUILDERS LTD.	Trust Bank Securities Limited	
14	1605140064808689	FS0541	VENUS BUILDERS LTD.	First Security Islam Capital & Investment Ltd.	
15	1202600064808689	UA7	VENUS BUILDERS LTD.	Remons Investment & Securities Limited	

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

Observations:

a. Individual Trade Pattern of "MD. KALAM HOSSAIN AND HIS ASSOCIATES":

Date	Code # 03923				Code # 37443				Code # 102955				Code # 1750				Code # 46314				Code # C299			
	BO ID # 1203980064815749				BO ID # 1203110068826218				BO ID # 1203260068826218				BO ID # 1205660068826218				BO ID # 1201950064794179				BO ID # 1202550064794179			
	MD. KALAM HOSSAIN				UDC CONSTRUCTION LIMITED				UDC CONSTRUCTION LIMITED				UDC CONSTRUCTION LIMITED				UDC CONSTRUCTION LTD.				UDC CONSTRUCTION LTD.			
	NBL Securities Limited				United Financial Trading Company Limited				MIKA Securities Limited				Trust Bank Securities Limited				EBL Securities Limited				Sheltech Brokerage Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
05-07-2022	100000	45.26	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-07-2022	100000	45.76	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-07-2022	90000	45.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-07-2022	2000	45.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-07-2022	40000	46.90	40000	48.25	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-07-2022	58000	46.52	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-07-2022	50000	45.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-07-2022	30000	44.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-07-2022	11558	43.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-07-2022	100	45.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-07-2022	20	45.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-07-2022	1944	43.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-07-2022	40000	44.56	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-08-2022	57407	45.80	85000	46.14	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-08-2022	100	48.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-08-2022	149090	55.24	25000	52.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-08-2022	42780	54.99	12725	57.52	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-08-2022	0	0.00	448015	58.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-08-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-08-2022	388109	56.25	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-09-2022	0	0.00	0	0.00	5000	68.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-09-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-10-2022	102000	142.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2800000	176.96	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

www.sec.gov.bd

Page 4 of 41

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

03-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1100	284.77	0	0.00	0	0.00	0	0.00
11-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8087	286.99	8331	288.05	0	0.00	0	0.00
12-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	21700	283.27	0	0.00	0	0.00	0	0.00
13-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	6000	288.22	0	0.00	0	0.00	0	0.00
16-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	6500	277.68	0	0.00	0	0.00	0	0.00
25-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	200000	296.60	0	0.00	0	0.00
26-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	46000	303.28	20000	306.83	0	0.00	0	0.00
27-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	71200	299.02	0	0.00	0	0.00	0	0.00
30-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	3000	298.20	0	0.00	0	0.00	0	0.00
03-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	6000	282.45	6500	262.52	0	0.00	0	0.00
07-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	138813	193.06	100000	185.50	0	0.00	0	0.00
17-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	40000	196.60	0	0.00	0	0.00
18-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	208.41	50000	213.00	0	0.00	0	0.00
21-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	44417	212.93	0	0.00	0	0.00	0	0.00
22-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	7000	204.79	0	0.00	0	0.00	0	0.00
24-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	280000	224.80	279000	226.50	0	0.00	0	0.00
04-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	16300	211.83	0	0.00	0	0.00	0	0.00
19-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20443	221.63	0	0.00	0	0.00	0	0.00
02-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	151571	214.11	0	0.00	0	0.00	0	0.00
Total	1263108		610740		5000		0		506530		469000		436672		0		6309276		2780168		0		0	

Date	Code # 1553				Code # 5634				Code # CM850				Code # D3685				Code # 12174				Code # 1751			
	BO ID # 1206470064794179				BO ID # 1602170064794179				BO ID # 1605170064794179				BO ID # 1204780064808689				BO ID # 1205590064808689				BO ID # 1205660064808689			
	UDC CONSTRUCTION LTD.				UDC CONSTRUCTION LTD.				UDC CONSTRUCTION LTD.				VENUS BUILDERS LTD.				VENUS BUILDERS LTD.				VENUS BUILDERS LTD.			
	NY Trading Limited				Mercantile Bank Securities Limited				City Bank Capital Resources Limited				United Securities Limited				UCB Stock Brokerage Limited				Trust Bank Securities Limited			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
05-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

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Page 6 of 41

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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29-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-01-2023	299070	270.00	300000	270.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	74307	280.90	0	0.00	0	0.00	0	0.00	0	0.00
01-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
06-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	25000	284.72	0	0.00	0	0.00	0	0.00	0	0.00
08-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	79433	295.86	0	0.00	0	0.00	0	0.00	0	0.00
13-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	39476	284.98	0	0.00	0	0.00	0	0.00	0	0.00
14-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	179532	285.83	200	285.40	0	0.00	0	0.00	0	0.00
15-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	195092	285.68	0	0.00	0	0.00	0	0.00	0	0.00
16-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	151922	279.03	0	0.00	0	0.00	0	0.00	0	0.00
19-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20169	280.57	0	0.00	0	0.00	0	0.00	0	0.00
20-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	91685	274.70	0	0.00	0	0.00	0	0.00	0	0.00
23-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	25016	288.01	0	0.00	0	0.00	0	0.00	0	0.00
27-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10603	281.12	0	0.00	0	0.00	0	0.00	0	0.00
28-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-03-2023	0	0.00	74500	268.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	209031	275.13	0	0.00	0	0.00	0	0.00	0	0.00
06-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	275735	289.48	0	0.00	0	0.00	0	0.00	0	0.00
07-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	402263	300.32	0	0.00	0	0.00	0	0.00	0	0.00
09-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	14281	315.70	0	0.00	0	0.00	0	0.00	0	0.00
12-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400	315.10	0	0.00	0	0.00	0	0.00
14-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	54100	300.14	0	0.00	0	0.00
20-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	59451	306.65	0	0.00	0	0.00
22-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	93549	303.69	0	0.00	0	0.00
23-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	91000	289.51	1097	287.68	0	0.00
09-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	29578	287.74	0	0.00	0	0.00
11-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	14300	289.69	0	0.00	0	0.00
12-04-2023	0	0.00	0	0.00	500	285.65	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400	286.00	0	0.00	0	0.00	0	0.00
13-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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15-05-2023	0	0.00	0	0.00	0	0.00	270000	175.05	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-05-2023	0	0.00	0	0.00	34000	198.96	100000	198.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-05-2023	0	0.00	0	0.00	170310	210.73	50000	214.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-05-2023	0	0.00	0	0.00	86000	212.70	5000	215.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-05-2023	0	0.00	0	0.00	6400	208.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-05-2023	0	0.00	0	0.00	5500	196.64	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-05-2023	0	0.00	0	0.00	50000	214.59	7459	210.63	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-05-2023	0	0.00	0	0.00	10513	218.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
25-05-2023	0	0.00	0	0.00	734	232.20	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-05-2023	0	0.00	0	0.00	79000	243.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-06-2023	0	0.00	0	0.00	0	0.00	34625	225.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-06-2023	0	0.00	0	0.00	273000	226.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-06-2023	0	0.00	0	0.00	0	0.00	105500	214.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-06-2023	0	0.00	0	0.00	0	0.00	72711	228.06	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
19-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-07-2023	0	0.00	0	0.00	22700	222.43	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-07-2023	0	0.00	0	0.00	61175	215.08	70000	217.40	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-08-2023	0	0.00	0	0.00	20000	221.01	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-08-2023	0	0.00	0	0.00	0	0.00	50897	214.19	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	638070		374600		1840532		808892		100000		0		3008790		249799		753140		1097		274681		0	

Date	Code # FS0541				Code # UA7				Total					
	BO ID # 1605140064808689				BO ID # 1202600064808689									
	VENUS BUILDERS LTD.				VENUS BUILDERS LTD.									
	First Security Islami Capital & Investment Lt				Remons Investment & Securities Limited									
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
05-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	100000	45.26	4525895.70	0	0.00	0.00
06-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	100000	45.76	4575966.40	0	0.00	0.00
07-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	90000	45.20	4068000.00	0	0.00	0.00
12-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	2000	45.10	90200.00	0	0.00	0.00
13-07-2022	75000	47.47	0	0.00	0	0.00	0	0.00	115000	47.27	5436000.00	40000	48.25	1930000.00
14-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	58000	46.52	2698400.00	0	0.00	0.00
18-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	50000	45.10	2255000.00	0	0.00	0.00
19-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	30000	44.20	1326000.00	0	0.00	0.00
20-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	11558	43.44	502084.60	0	0.00	0.00
25-07-2022	10000	43.20	0	0.00	0	0.00	0	0.00	10000	43.20	432000.00	0	0.00	0.00
26-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	100	45.70	4570.00	0	0.00	0.00
27-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	20	45.00	900.00	0	0.00	0.00
28-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	1944	43.60	84758.40	0	0.00	0.00
31-07-2022	0	0.00	0	0.00	0	0.00	0	0.00	40000	44.56	1782500.00	0	0.00	0.00
01-08-2022	0	0.00	0	0.00	0	0.00	0	0.00	57407	45.80	2629240.60	85000	46.14	3921503.00
07-08-2022	0	0.00	0	0.00	0	0.00	0	0.00	100	48.70	4870.00	0	0.00	0.00
08-08-2022	135482	56.02	0	0.00	0	0.00	0	0.00	284572	55.61	15825175.30	25000	52.80	1320000.00
14-08-2022	0	0.00	450000	56.26	0	0.00	0	0.00	42780	54.99	2352344.00	462725	56.30	26049719.40
16-08-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	448015	58.10	26028282.90
24-08-2022	70000	57.98	0	0.00	0	0.00	0	0.00	70000	57.98	4058662.50	0	0.00	0.00
25-08-2022	0	0.00	0	0.00	0	0.00	0	0.00	388109	56.25	21832629.00	0	0.00	0.00
06-09-2022	0	0.00	0	0.00	0	0.00	0	0.00	5000	68.30	341500.00	0	0.00	0.00
26-09-2022	3800	130.78	0	0.00	0	0.00	0	0.00	3800	130.78	496976.00	0	0.00	0.00
17-10-2022	42000	138.63	0	0.00	0	0.00	0	0.00	42000	138.63	5822336.00	0	0.00	0.00



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19-10-2022	0	0.00	43000	142.30	0	0.00	0	0.00	102000	142.90	14575700.00	43000	142.30	6118850.00
23-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	169301	150.46	25472208.80	0	0.00	0.00
24-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	110515	153.87	17004669.00	0	0.00	0.00
25-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	297033	154.74	45964059.20	0	0.00	0.00
26-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	125000	159.70	19962500.00	0	0.00	0.00
27-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	200151	175.20	35065685.10	0	0.00	0.00
30-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	299000	167.00	49932521.00	0	0.00	0.00
31-10-2022	0	0.00	0	0.00	0	0.00	0	0.00	51878	184.35	9563924.70	0	0.00	0.00
02-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	36122	192.90	6967933.80	0	0.00	0.00
08-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	20000	174.19	3483843.40	0	0.00	0.00
13-11-2022	100000	180.99	0	0.00	0	0.00	0	0.00	100000	180.99	18099435.20	0	0.00	0.00
14-11-2022	50000	182.63	0	0.00	0	0.00	0	0.00	50000	182.63	9131488.00	0	0.00	0.00
15-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	280000	176.96	49549515.40	0	0.00	0.00
16-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	4374	184.50	807003.00	0	0.00	0.00
20-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	100000	183.43	18342530.80	0	0.00	0.00
21-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	100000	175.86	17586005.80	0	0.00	0.00
22-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	50307	182.65	9188667.80	0	0.00	0.00
23-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	20000	179.10	3582000.00	0	0.00	0.00
28-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	18000	177.04	3186688.10	0	0.00	0.00
29-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	82000	179.60	14727200.00	0	0.00	0.00
30-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	24000	187.07	4489710.00	0	0.00	0.00
01-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	26700	185.90	4963530.00	0	0.00	0.00
02-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	29328	183.88	5392785.40	150000	183.23	27485000.00
03-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	96263	184.26	17737293.30	98799	184.84	18261694.90
04-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	20000	199.45	3989086.20	0	0.00	0.00
05-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	27722	213.61	5921736.00	42800	212.19	9081612.60
08-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	11485	213.56	2452775.00	0	0.00	0.00
09-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	39576	213.83	8462601.00	0	0.00	0.00
10-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	65244	209.56	13672684.20	0	0.00	0.00
11-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	80139	217.44	17425143.60	0	0.00	0.00
12-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	44731	223.81	10011359.50	0	0.00	0.00
15-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	161053	225.11	36254811.20	0	0.00	0.00
16-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	137570	231.95	31909397.60	30000	229.70	6891000.00
17-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	447745	230.98	103418200.30	0	0.00	0.00
18-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	50411	222.35	11208662.60	0	0.00	0.00
19-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	217652	228.23	49674155.50	2129	228.30	486050.70
22-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	506188	243.34	123176958.10	0	0.00	0.00
23-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	147284	253.11	37278560.10	0	0.00	0.00
24-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	92209	267.02	24621656.80	6000	259.70	1558200.00
25-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	92401	285.13	26346509.00	30952	284.93	8819040.80
26-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	107662	278.46	29979802.20	27927	282.36	7885572.70
29-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	192252	286.92	55160945.50	47676	283.70	13525558.10
30-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	74307	280.90	20872536.10	0	0.00	0.00
31-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	346574	269.57	93425295.60	300000	270.30	81090000.00
01-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	48498	269.64	13077098.30	28691	269.35	7728043.70
05-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	15623	262.54	4101681.20	24463	264.92	6480815.60
06-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	90710	271.57	24634217.80	300000	266.80	80040913.90
07-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	242125	283.38	68612231.60	178557	281.00	50174101.00
08-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	311235	297.96	92735497.50	61761	292.25	18049448.80
09-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	121252	298.60	36206396.00	15000	303.00	4545000.00
12-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	129859	286.58	37214435.50	38849	284.00	11033099.50
13-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	604875	286.78	173466959.30	157631	285.40	44987864.80
14-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	275186	286.06	78718372.00	5300	287.36	1523022.10
15-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	235444	279.29	65758174.90	0	0.00	0.00
16-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	42960	280.78	12062409.60	15000	278.80	4182000.00
19-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	90529	281.95	25524540.30	74903	280.67	21023076.90
20-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	294147	277.02	81484065.30	104427	278.64	29097065.00
22-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	39282	283.71	11144798.70	16894	284.55	4807242.10
23-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	118182	287.14	33934954.10	43247	285.30	12338330.40

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26-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	147529	290.05	42790442.80	94336	289.36	27296663.80
27-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	149446	278.44	41612466.60	139370	276.55	38543234.70
28-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	171713	280.40	48148532.70	73931	280.95	20770596.60
01-03-2023	0	0.00	0	0.00	56650	280.07	0	0.00	68850	280.15	19288362.10	2785	280.54	781290.00
02-03-2023	0	0.00	0	0.00	26295	274.83	4375	273.05	317687	275.08	87389219.10	160593	270.96	43514958.00
05-03-2023	0	0.00	0	0.00	36145	289.71	0	0.00	413092	289.94	119772204.40	42490	289.02	12280570.40
06-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	609443	300.95	183413343.90	148222	302.48	44834456.70
07-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	68637	313.69	21531077.00	0	0.00	0.00
09-03-2023	0	0.00	0	0.00	27380	316.55	0	0.00	341471	320.99	109608161.40	56012	316.09	17704901.00
12-03-2023	0	0.00	0	0.00	90000	312.30	0	0.00	244412	314.06	76759067.50	40903	312.80	12794424.80
13-03-2023	0	0.00	0	0.00	30020	311.62	0	0.00	107518	312.25	33572456.60	30836	312.83	9646395.90
14-03-2023	0	0.00	0	0.00	31000	317.76	0	0.00	62999	316.97	19968565.80	0	0.00	0.00
15-03-2023	0	0.00	0	0.00	59220	305.87	0	0.00	112780	306.01	34511524.00	0	0.00	0.00
16-03-2023	0	0.00	0	0.00	88500	300.76	723	295.35	302557	304.55	92144712.30	86935	304.25	26449809.30
19-03-2023	0	0.00	0	0.00	30000	318.17	0	0.00	59905	316.45	18956949.30	0	0.00	0.00
20-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	60966	306.60	18692449.70	0	0.00	0.00
21-03-2023	0	0.00	0	0.00	317061	303.71	0	0.00	540590	303.86	164262562.70	0	0.00	0.00
22-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	170634	306.94	52373846.20	47000	309.42	14542598.90
23-03-2023	0	0.00	0	0.00	19000	314.63	0	0.00	627157	314.13	197010790.00	47750	307.41	14678875.30
27-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	26696	313.15	8359832.10	8577	320.45	2748539.70
28-03-2023	0	0.00	0	0.00	21988	303.11	0	0.00	121878	302.45	36862604.30	0	0.00	0.00
29-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	27379	303.74	8316181.80	15393	303.36	4669649.70
30-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	103458	295.58	30579871.20	0	0.00	0.00
02-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	5534	291.83	1614986.70	995	289.20	287754.00
03-04-2023	0	0.00	0	0.00	59535	286.08	0	0.00	251350	288.69	72563359.50	1097	287.68	315589.50
04-04-2023	0	0.00	0	0.00	114119	287.79	0	0.00	114119	287.79	32842391.00	0	0.00	0.00
09-04-2023	0	0.00	0	0.00	35000	286.95	0	0.00	65678	287.27	18867380.70	0	0.00	0.00
10-04-2023	0	0.00	0	0.00	100356	287.69	0	0.00	122743	287.88	35334828.60	8331	288.05	2399769.10
11-04-2023	0	0.00	0	0.00	12000	295.21	0	0.00	33700	287.52	9689435.30	0	0.00	0.00
12-04-2023	0	0.00	0	0.00	1210	284.02	0	0.00	301401	287.99	86800163.60	400	286.00	114400.00
13-04-2023	0	0.00	0	0.00	32313	286.63	0	0.00	32313	286.63	9261911.00	0	0.00	0.00
16-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	6500	277.68	1804900.00	0	0.00	0.00
24-04-2023	0	0.00	0	0.00	450	301.00	0	0.00	450	301.00	135450.00	200000	296.60	59320623.50
25-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	46000	303.28	13950828.90	20000	306.83	6136558.40
26-04-2023	0	0.00	0	0.00	127600	299.17	0	0.00	198800	299.12	59464896.50	0	0.00	0.00
27-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	3000	298.20	894600.00	0	0.00	0.00
30-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	6000	282.45	1694700.00	6500	262.52	1706400.00
03-05-2023	0	0.00	0	0.00	0	0.00	40483	254.45	0	0.00	0.00	40483	254.45	10300834.70
07-05-2023	0	0.00	0	0.00	49000	245.07	9000	253.01	205672	232.90	47900891.50	9000	253.81	2284320.60
09-05-2023	0	0.00	0	0.00	0	0.00	110000	225.01	0	0.00	0.00	110000	225.01	24751483.50
10-05-2023	0	0.00	0	0.00	108427	231.08	0	0.00	108427	231.08	25055342.00	0	0.00	0.00
15-05-2023	0	0.00	0	0.00	500	178.10	0	0.00	139313	193.01	26888764.10	370000	177.87	65812920.10
16-05-2023	0	0.00	0	0.00	0	0.00	59650	202.70	34000	198.96	6764716.50	199650	199.22	39775055.00
17-05-2023	0	0.00	0	0.00	136974	209.52	76000	211.50	327204	210.08	68756455.70	176000	212.75	37443900.00
18-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	130417	212.78	27750021.70	5000	215.50	1077500.00
21-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	6400	208.40	1333775.50	0	0.00	0.00
22-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	12500	201.20	2515060.30	0	0.00	0.00
23-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	50000	214.59	10729361.30	7459	210.63	1571108.80
24-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	10513	218.44	2296493.10	0	0.00	0.00
25-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	734	232.20	170434.80	0	0.00	0.00
28-05-2023	0	0.00	0	0.00	0	0.00	0	0.00	79000	243.24	19215962.00	0	0.00	0.00
29-05-2023	0	0.00	0	0.00	78000	225.23	7000	225.70	78000	225.23	17567957.50	7000	225.70	1579900.00
01-06-2023	0	0.00	0	0.00	127625	221.16	87000	220.22	407625	223.66	91169528.10	400625	225.05	90158695.00
04-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	273000	226.61	61865500.00	0	0.00	0.00
11-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	105500	214.60	22640300.00
12-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	72711	228.06	16582819.00
13-06-2023	0	0.00	0	0.00	0	0.00	121578	216.48	0	0.00	0.00	121578	216.48	26319622.00
14-06-2023	0	0.00	0	0.00	45900	223.59	46600	228.81	45900	223.59	10262718.70	46600	228.81	10662440.00
26-06-2023	0	0.00	0	0.00	0	0.00	0	0.00	16300	211.83	3452770.00	0	0.00	0.00

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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19-07-2023	0	0.00	0	0.00	0	0.00	78329	225.17	0	0.00	0.00	78329	225.17	17637661.80
30-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	43143	222.05	9579901.40	0	0.00	0.00
31-07-2023	0	0.00	0	0.00	0	0.00	0	0.00	61175	215.08	13157706.80	70000	217.40	15218000.00
02-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	20000	221.01	4420283.30	0	0.00	0.00
07-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	151571	214.11	32452740.30	0	0.00	0.00
08-08-2023	0	0.00	0	0.00	0	0.00	0	0.00	350000	218.17	76359951.60	470897	213.92	100733850.70
Total	486282		493000		1862268		640738		18011833			6428034		

b. Effects of "SEAPEARL" at DSE by "MD. KALAM HOSSAIN AND HIS ASSOCIATES": (Both Public & Block Market)

Date	Buy			Sale			Shares Received/ Transfer			Cost of shares sold		Stock Position			Comparison with the Market						
	Qty.	Price	Amount	Qty.	Price	Amount	Share Credited	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Change d by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance																					
05-07-2022	100000	45.26	4525896	0	0.00	0		0	0	0	0.00	0	6735744	23.30	156963378						
06-07-2022	100000	45.76	4575966	0	0.00	0		0	0	0	0.00	0	6835744	23.62	161489274	781905	45.40	2.95%	12.79%	0.00%	12.79%
07-07-2022	90000	45.20	4068000	0	0.00	0		0	0	0	0.00	0	6935744	23.94	166065240	481387	45.30	-0.22%	20.77%	0.00%	20.77%
12-07-2022	2000	45.10	90200	0	0.00	0		0	0	0	0.00	0	7025744	24.22	170133240	550984	45.20	-0.22%	16.33%	0.00%	16.33%
13-07-2022	115000	47.27	5436000	40000	48.25	1930000		0	0	0	0.00	0	7027744	24.22	170223440	680840	46.20	2.21%	0.29%	0.00%	0.29%
14-07-2022	58000	46.52	2698400	0	0.00	0		0	0	0	24.59	983708	7102744	24.59	174675732	1852067	46.60	0.87%	6.21%	2.16%	8.37%
18-07-2022	50000	45.10	2255000	0	0.00	0		0	0	0	0.00	0	7160744	24.77	177374132	356925	46.90	0.64%	16.25%	0.00%	16.25%
19-07-2022	30000	44.20	1326000	0	0.00	0		0	0	0	0.00	0	7210744	24.91	179629132	368327	45.10	-1.96%	13.57%	0.00%	13.57%
20-07-2022	11558	43.44	502085	0	0.00	0		0	0	0	0.00	0	7240744	24.99	180955132	234442	44.20	-2.00%	12.80%	0.00%	12.80%
25-07-2022	10000	43.20	432000	0	0.00	0		0	0	0	0.00	0	7252302	25.02	181457217	301182	44.00	-0.45%	3.84%	0.00%	3.84%
26-07-2022	100	45.70	4570	0	0.00	0		0	0	0	0.00	0	7262302	25.05	181889217	188587	44.30	1.61%	5.30%	0.00%	5.30%
27-07-2022	20	45.00	900	0	0.00	0		0	0	0	0.00	0	7262402	25.05	181893787	293684	44.30	0.00%	0.03%	0.00%	0.03%
28-07-2022	1944	43.60	84758	0	0.00	0		0	0	0	0.00	0	7262422	25.05	181894687	314352	44.10	-0.45%	0.01%	0.00%	0.01%
31-07-2022	40000	44.56	1782500	0	0.00	0		0	0	0	0.00	0	7264366	25.05	181979445	69888	44.00	-0.23%	2.78%	0.00%	2.78%
01-08-2022	57407	45.80	2629241	85000	46.14	3921503		0	0	0	0.00	0	7304366	25.16	183761945	451897	45.90	4.32%	8.85%	0.00%	8.85%
07-08-2022	100	48.70	4870	0	0.00	0		0	0	0	25.32	2152097	7276773	25.32	184239088	1188734	47.20	2.83%	4.83%	7.15%	11.98%
08-08-2022	284572	55.61	15825175	25000	52.80	1320000		0	0	0	26.46	661478	7276873	25.32	184243958	4758135	53.00	9.96%	0.00%	0.00%	0.00%
14-08-2022	42780	54.99	2352344	462725	56.30	26049719		0	0	0	26.62	661478	7536445	26.46	199407656	4498583	56.40	6.42%	6.33%	0.56%	6.88%
16-08-2022	0	0.00	0	448015	58.10	26028283		0	0	0	26.62	12317802	7116500	26.62	189442197	3577978	57.20	6.32%	1.20%	12.93%	14.13%
24-08-2022	70000	57.98	4058663	0	0.00	0		0	0	0	0.00	0	6668485	26.62	177515977	3968405	57.70	0.87%	0.00%	11.29%	11.29%
25-08-2022	388109	56.25	21832629	0	0.00	0		0	0	0	0.00	0	6738485	26.95	181574640	764259	56.10	-3.44%	9.16%	0.00%	9.16%
06-09-2022	5000	68.30	341500	0	0.00	0		0	0	0	0.00	0	7126594	28.54	203407269	1385957	59.30	5.70%	28.00%	0.00%	28.00%
26-09-2022	3800	130.78	496976	0	0.00	0		0	0	0	0.00	0	7131594	28.57	203748769	2917444	68.90	9.89%	0.17%	0.00%	0.17%
17-10-2022	42000	138.63	5822336	0	0.00	0		0	0	0	0.00	0	7135394	28.62	204245745	1733775	129.00	-6.25%	0.22%	0.00%	0.22%
18-10-2022	0	0.00	0	0	0.00	0		0	0	0	0.00	0	7177394	29.27	210068081	1450210	131.50	-7.52%	2.90%	0.00%	2.90%
19-10-2022	102000	142.90	14575700	43000	142.30	6118850		1013440	134.2	136003648	0.00	0	8190834	42.25	346071729	925852	134.20	2.05%	0.00%	0.00%	0.00%
20-10-2022	0	0.00	0	0	0.00	0		0	0	0	43.49	1870029	8249834	43.49	358777400	2262407	135.10	0.67%	4.51%	1.90%	6.41%
23-10-2022	169301	150.46	25472209	0	0.00	0		2400000	139.6	335040000	0.00	0	10649834	65.15	693817400	1189284	139.60	3.33%	0.00%	0.00%	0.00%
24-10-2022	110515	153.87	17004669	0	0.00	0		2500000	139.6	349000000	0.00	0	13319135	80.21	1068289609	2808577	150.60	7.88%	6.03%	0.00%	6.03%
25-10-2022	297033	154.74	45964059	0	0.00	0		0	0	0	0.00	0	13429650	80.81	1085294278	961272	153.10	1.66%	11.50%	0.00%	11.50%
26-10-2022	125000	159.70	19962500	0	0.00	0		0	0	0	0.00	0	13726683	82.41	1131258337	1837458	154.80	1.11%	16.17%	0.00%	16.17%
27-10-2022	200151	175.20	35065685	0	0.00	0		0	0	0	0.00	0	13851683	83.11	1151220837	2858310	168.70	8.98%	4.37%	0.00%	4.37%
30-10-2022	299000	167.00	49932521	0	0.00	0		0	0	0	0.00	0	14051834	84.42	1186286522	3049412	169.00	0.18%	6.56%	0.00%	6.56%
31-10-2022	51878	184.35	9563925	0	0.00	0		0	0	0	0.00	0	14350834	86.14	1236219043	2426182	173.70	2.78%	12.32%	0.00%	12.32%
02-11-2022	36122	192.90	6967934	0	0.00	0		0	0	0	0.00	0	14402712	86.50	1245782968	2082485	188.00	8.23%	2.49%	0.00%	2.49%
06-11-2022	0	0.00	0	900000	185.00	166500000		0	0	0	0.00	0	14438834	86.76	1252750901	1229961	187.50	-1.52%	2.94%	0.00%	2.94%
08-11-2022	20000	174.19	3483843	0	0.00	0		0	0	0	86.76	78086348	13538834	86.76	1174664554	2215627	174.70	-5.21%	0.00%	40.62%	40.62%
13-11-2022	100000	180.99	18099435	100000	178.50	17850000		1200000	169.2	203040000	0.00	0	14758834	93.58	1381188397	1007159	169.20	-4.30%	1.99%	0.00%	1.99%
14-11-2022	50000	182.63	9131488	0	0.00	0		0	0	0	94.17	9417212	14758834	94.17	1389870621	1612623	181.30	4.02%	6.20%	6.20%	12.40%
15-11-2022	280000	176.96	49549515	0	0.00	0		500000	182.5	91250000	0.00	0	15308834	97.35	1490252109	1822038	182.50	0.66%	2.74%	0.00%	2.74%
16-11-2022	4374	184.50	807003	0	0.00	0		500000	180.4	90200000	0.00	0	16088834	101.31	1630001624	805993	180.40	-1.15%	34.74%	0.00%	34.74%
20-11-2022	100000	183.43	18342531	0	0.00	0		0	0	0	0.00	0	16093208	101.34	1630808627	953406	184.80	2.44%	0.46%	0.00%	0.46%
21-11-2022	100000	175.86	17586006	0	0.00	0		0	0	0	0.00	0	16193208	101.84	1649151158	1019121	179.00	-3.14%	9.81%	0.00%	9.81%
22-11-2022	50307	182.65	9188668	0	0.00	0		0	0	0	0.00	0	16293208	102.30	1666737164	334774	176.10	-1.62%	29.87%	0.00%	29.87%
23-11-2022	20000	179.10	3582000	0	0.00	0		0	0	0	0.00	0	16343515	102.54	1675925832	955208	184.40	4.71%	5.27%	0.00%	5.27%
27-11-2022	0	0.00	0	39401	170.00	6690170		0	0	0	102.64	4044014	16363515	102.64	1679507832	613037	179.80	-2.49%	3.26%	0.00%	3.26%
28-11-2022	18000	177.04	3186688	0	0.00	0		0	0	0	102.64	4044014	16324114	102.64	1675463817	635770	178.50	0.51%	0.00%	6.20%	6.20%
29-11-2022	82000	179.60	14727200	225003	171.72	38636516		0	0	0	0.00	0	16342114	102.72	1678650505	547693	175.90	-1.46%	3.29%	0.00%	3.29%
30-11-2022	24000	187.07	4489710	0	0.00	0		0	0	0	103.10	23190516	16199111	103.10	1670179190	991251	183.80	4.49%	8.27%	22.70%	30.97%
				0	0.00	0		0	0	0	0.00	0	16223111	103.23	1674668900	731938	187.10	1.80%	3.28%	0.00%	3.28%

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01-12-2022	175700	183.95	32319930	0	0.00	0		0	0	0	0.00	0	16398811	104.09	1706988830	691189	178.40	-4.65%	25.42%	0.00%	25.42%
22-12-2022	0	0.00	0	500000	169.06	84531400		0	0	0	104.09	52046116	15898811	104.09	1654942714	1258808	190.70	4.49%	0.00%	39.72%	39.72%
26-12-2022	0	0.00	0	300000	178.33	53500000		1250000	186.6	233250000	110.11	33031900	16848811	110.11	1855160814	978443	186.60	-2.15%	0.00%	30.66%	30.66%
29-12-2022	0	0.00	0	67000	174.00	11658000		0	0	0	110.11	7377124	16781811	110.11	1847783690	553780	186.70	0.00%	0.00%	12.10%	12.10%
02-01-2023	29328	183.88	5392785	150000	183.23	27485000		0	0	0	110.24	16535255	16661139	110.24	1836641220	396129	183.10	-0.49%	7.40%	37.87%	45.27%
03-01-2023	96263	184.26	17737293	98799	184.84	18261695		0	0	0	110.66	10933123	16658603	110.66	1843445390	368634	184.50	0.76%	26.11%	26.80%	52.91%
04-01-2023	20000	199.45	3989086	103000	184.05	10957000		0	0	0	110.77	11408974	16575603	110.77	1836025502	1579012	202.80	9.92%	1.27%	6.52%	7.79%
05-01-2023	27722	213.61	5921736	204799	201.33	41231413		0	0	0	110.94	22720085	16398526	110.94	1819227153	883796	212.20	4.64%	3.14%	23.17%	26.31%
08-01-2023	127485	195.76	24956775	416002	193.78	80614387		0	0	0	111.59	46422830	16110009	111.59	1797761098	996094	214.00	0.85%	12.80%	41.76%	54.56%
09-01-2023	39576	213.83	8462601	0	0.00	0		500	147.91	73955	0.00	0	16150085	111.84	1806297654	512717	212.00	-0.93%	7.72%	0.00%	7.72%
10-01-2023	65244	209.56	13672684	23700	195.00	4621500		0	0	0	112.24	2660032	16191629	112.24	1817310306	777431	207.10	-2.31%	8.39%	3.05%	11.44%
11-01-2023	80139	217.44	17425144	892412	193.03	172259466		0	0	0	112.76	106624587	15379356	112.76	1734110863	1665114	218.30	5.41%	4.81%	53.59%	58.41%
12-01-2023	44731	223.81	10011360	65150	207.51	13519551		1211500	223	270164500	121.08	7888557	16570437	121.08	2006398165	839048	223.00	2.15%	5.33%	7.76%	13.10%
15-01-2023	161053	225.11	36254811	71021	203.85	14477386		0	0	0	122.08	8670552	16660469	122.08	2033982424	1083167	227.60	2.06%	14.87%	6.56%	21.43%
16-01-2023	153055	232.66	35610313	66279	218.23	14464392		0	0	0	123.09	8158345	16747245	123.09	2061434391	667706	229.80	0.97%	22.92%	9.93%	32.05%
17-01-2023	447745	230.98	103418200	440000	212.49	93494000		0	0	0	125.90	55396086	16754990	125.90	2109456506	1443035	230.00	0.09%	31.03%	30.49%	61.52%
18-01-2023	50411	222.35	11208663	0	0.00	0		1766860	222.7	393479722	0.00	0	18572261	135.37	2514144890	399387	222.70	-3.17%	12.62%	0.00%	12.62%
19-01-2023	717652	224.38	161024156	961135	216.29	207884922		0	0	0	138.68	133292390	18328778	138.68	2541876656	1941712	228.30	2.51%	38.97%	52.19%	91.15%
22-01-2023	506188	243.34	123176958	224586	218.54	49081068		0	0	0	141.50	31777797	18610380	141.50	2633275817	1111662	245.00	7.31%	45.53%	20.20%	65.74%
23-01-2023	147284	253.11	37278560	170469	225.32	38409835		0	0	0	142.37	24269906	18587195	142.37	2646284471	888381	253.00	3.27%	16.66%	19.29%	35.95%
24-01-2023	92209	267.02	24621657	70022	236.17	16537032		0	0	0	142.99	10012214	18609382	142.99	2660893914	812064	273.70	8.18%	11.35%	8.62%	19.98%
25-01-2023	92401	285.13	26346509	89752	269.12	24154340		0	0	0	143.69	12896375	18612031	143.69	2674344049	715870	283.80	3.69%	12.91%	12.54%	25.44%
26-01-2023	107662	278.46	29979802	27927	282.36	7885573		0	0	0	144.46	4034449	18691766	144.46	2700289401	783785	275.10	-3.07%	13.74%	3.56%	17.30%
29-01-2023	192252	286.92	55160946	236322	270.21	63857536		0	0	0	145.91	34482785	18647696	145.91	2720967562	852954	283.30	2.98%	22.54%	27.71%	50.25%
30-01-2023	74307	280.90	20872536	20498	259.00	5308982		0	0	0	146.45	3001935	18701505	146.45	2738838163	459459	280.10	-1.13%	16.17%	4.46%	20.63%
31-01-2023	346574	269.57	93425296	306053	270.10	82663780		0	0	0	148.69	45507094	18742026	148.69	2786756364	1873665	263.50	-5.93%	18.50%	16.33%	34.83%
01-02-2023	48498	269.64	13077098	237690	246.56	58605803		0	0	0	149.00	35416384	18552834	149.00	2764417078	855142	269.20	2.16%	5.67%	27.80%	33.47%
02-02-2023	0	0.00	0	149702	246.04	36833082		0	0	0	149.00	22305960	18403132	149.00	2742111119	979436	271.00	0.67%	0.00%	15.28%	15.28%
05-02-2023	15623	262.54	4101681	24463	264.92	6480816		0	0	0	149.10	3647402	18394292	149.10	2742565398	903688	261.60	-3.47%	1.73%	2.71%	4.44%
06-02-2023	90710	271.57	24634218	442750	258.60	114496264		0	0	0	149.70	66279551	18042252	149.70	2700920065	1932953	272.10	4.01%	4.69%	22.91%	27.60%
07-02-2023	242125	283.38	68612232	699046	262.41	183434047		0	0	0	151.47	105884410	17585331	151.47	2663647886	1671846	284.40	4.52%	14.48%	41.81%	56.30%
08-02-2023	311235	297.96	92735498	216452	269.60	58355019		0	0	0	154.02	33337384	17680114	154.02	2723046000	1555248	298.90	5.10%	20.01%	13.92%	33.93%
09-02-2023	121252	298.60	36206396	15000	303.00	4545000		0	0	0	155.00	2325034	17786366	155.00	2756927361	792796	293.00	-1.97%	15.29%	1.89%	17.19%
12-02-2023	129859	286.58	37214436	38849	284.00	11033100		0	0	0	155.96	6058732	17877376	155.96	2788083064	715743	283.40	-3.28%	18.14%	5.43%	23.57%
13-02-2023	604875	286.78	173466595	578318	274.46	158726518		0	0	0	160.24	92668241	17903933	160.24	2868881783	1552287	288.40	1.76%	38.97%	37.26%	76.22%
14-02-2023	275186	286.06	78718372	105299	264.51	27852759		0	0	0	162.14	17073399	18073820	162.14	2930526756	660371	282.80	-1.94%	41.67%	15.95%	57.62%
15-02-2023	235444	279.29	65758175	0	0.00	0		0	0	0	0.00	0	18309264	163.65	2996284931	573827	276.70	-2.16%	41.03%	0.00%	41.03%
16-02-2023	42960	280.78	12062410	24001	269.12	6459253		0	0	0	163.92	3934310	18328223	163.92	3004413030	356706	278.80	0.76%	12.04%	6.73%	18.77%
19-02-2023	90529	281.95	25524540	137804	269.79	37178347		0	0	0	164.50	22669154	18280948	164.50	3007268417	527297	279.10	0.11%	17.17%	26.13%	43.30%
20-02-2023	294147	277.02	81484065	184927	276.29	51092565		0	0	0	166.28	30750515	18390168	166.28	3058001968	1003249	279.70	0.21%	29.32%	18.43%	47.75%
22-02-2023	39282	283.71	11144799	123943	262.34	32515813		0	0	0	166.53	20640836	18305507	166.53	3048505930	450978	285.10	1.93%	8.71%	27.48%	36.19%
23-02-2023	118182	287.14	33934954	170132	271.95	46268157		500000	287.8	143900000	170.49	29006175	18753557	170.49	3197334710	573494	287.80	0.95%	20.61%	29.67%	50.27%
26-02-2023	147529	290.05	42790443	182061	279.62	50908571		0	0	0	171.43	31209869	18719025	171.43	3208915283	704429	280.70	-2.47%	20.94%	25.85%	46.79%
27-02-2023	149446	278.44	41612467	291689	267.02	77885462		0	0	0	172.27	50250134	18576782	172.27	3200277616	722688	277.30	-1.21%	20.68%	40.36%	61.04%
28-02-2023	171713	280.40	48148533	284231	265.19	75374997		0	0	0	173.26	49246800	18464264	173.26	3199179347	900763	281.40	1.48%	19.06%	31.55%	50.62%
01-03-2023	68850	280.15	19288362	232595	258.94	60228703		0	0	0	173.66	40392537	18300519	173.66	3178075172	903752	276.30	-1.81%	7.62%	25.74%	33.35%
02-03-2023	317687	275.08	87389219	269043	265.52	71436253		0	0	0	175.39	47187701	18349163	175.39	3218276690	985233	275.20	-0.40%	32.24%	27.31%	59.55%
05-03-2023	413092	289.94	119772204	1643531	267.95	440382749		2598470	155.39	403776253.3	175.17	287902476	19717194	175.17	3453922671	3046347	290.60	5.60%	13.56%	53.95%	67.51%
06-03-2023	609443	300.95	183413344	489434	282.84	138432107		0	0	0	178.94	87581429	19837203	178.94	3549754586	1691460	306.00	5.30%	36.03%	28.94%	64.97%
07-03-2023	68637	313.69	21531077	677997	284.64	192987534		0	0	0	179.41	121638723	19227843	179.41	3449646940	1564610	313.30	2.39%	4.39%	43.33%	47.72%
09-03-2023	341471	320.99	109608161	56012	316.09	17704901		0	0	0	181.88	10187429	19513302	181.88	3549067672	822159	320.10	2.17%	41.53%	6.81%	48.35%
12-03-2023	244412	314.06	76759068	40903	312.80	12794425		0	0	0	183.51	7506293	19716811	183.51	3618320447	740580	311.80	-2.59%	33.00%	5.52%	38.53%
13-03-2023	107518	312.25	33572457	38036	312.83	9646396		0	0	0											

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04-04-2023	134119	287.37	38542391	89000	263.00	23407000		0	0	0	204.44	18194855	20299394	204.44	4149938643	581623	288.60	0.49%	23.06%	15.30%	38.36%
06-04-2023	0	0.00	0	147000	265.42	39017200		0	0	0	204.44	30052177	20152394	204.44	4119886466	725665	281.20	-2.56%	0.00%	20.26%	20.26%
09-04-2023	65678	287.27	18867381	10021	272.00	2725712		0	0	0	204.71	2051355	20208051	204.71	4136702491	1010600	287.70	2.31%	6.50%	0.99%	7.49%
10-04-2023	122743	287.88	35334829	8331	288.05	2399769		0	0	0	205.21	1709586	20322463	205.21	4170327734	658217	287.50	0.07%	18.65%	1.27%	19.91%
11-04-2023	183700	293.36	53889435	109422	266.07	29114145		0	0	0	206.00	22540652	20396741	206.00	4201676517	873178	286.00	-0.52%	21.04%	12.53%	33.57%
12-04-2023	301401	287.99	86800164	320400	261.13	83666400		0	0	0	207.19	66384119	20377742	207.19	4222092561	890416	288.00	0.70%	33.85%	35.98%	69.83%
13-04-2023	32313	286.63	9261911	35673	263.70	9406970		0	0	0	207.32	7395625	20374382	207.32	4223958847	485606	282.70	-1.84%	6.65%	7.35%	14.00%
16-04-2023	6500	277.68	1804900	0	0.00	0		0	0	0	0.00	0	20380882	207.34	4225763747	699336	276.50	-2.19%	0.93%	0.00%	0.93%
24-04-2023	450	301.00	135450	200000	296.60	59320624		0	0	0	207.34	41468332	20181332	207.34	4184430865	1563852	301.80	5.56%	0.03%	12.79%	12.82%
25-04-2023	46000	303.28	13950829	139001	288.14	40051843		0	0	0	207.56	28851025	20088331	207.56	4169530670	1183857	303.50	0.56%	3.89%	11.74%	15.63%
26-04-2023	198800	299.12	59464897	17000	288.00	4996000		0	0	0	208.46	3543770	20270131	208.46	4225451796	1278029	299.10	-1.45%	15.56%	1.33%	16.89%
27-04-2023	3000	298.20	894600	0	0.00	0		0	0	0	0.00	0	20273131	208.47	4226346396	640958	287.50	-3.88%	0.47%	0.00%	0.47%
30-04-2023	6000	282.45	1694700	106500	282.69	30106400		0	0	0	208.49	22204422	20172631	208.49	4205836675	1270192	262.40	-8.73%	0.47%	8.38%	8.86%
03-05-2023	0	0.00	0	40483	254.45	10300835		0	0	0	208.49	8440391	20132148	208.49	4197396284	861399	250.60	0.32%	0.00%	4.70%	4.70%
07-05-2023	205672	232.90	47900892	9000	253.81	2284321		0	0	0	208.74	1878651	20328820	208.74	4243418524	1490435	229.60	-8.38%	13.80%	0.60%	14.40%
08-05-2023	0	0.00	0	0	0.00	0		1000000	210.1	210100000	0.00	0	21328820	208.80	4453518524	1417238	210.10	-8.49%	0.00%	0.00%	0.00%
09-05-2023	0	0.00	0	296000	218.74	64747984		0	0	0	208.80	61805645	21032820	208.80	4391712879	1018791	228.40	8.71%	0.00%	29.05%	29.05%
10-05-2023	108427	231.08	25055342	130000	220.00	28600000		0	0	0	208.92	27159224	21011247	208.92	4389608996	940458	229.90	0.66%	11.53%	13.82%	25.35%
14-05-2023	326000	215.76	70338600	0	0.00	0		0	0	0	0.00	0	21337247	209.02	4459947596	1828293	192.90	-8.71%	17.83%	0.00%	17.83%
15-05-2023	139313	193.01	26888764	510000	185.32	94512920		0	0	0	208.92	106548094	20966560	208.92	4380288266	1770899	184.30	-4.46%	7.87%	28.80%	36.67%
16-05-2023	34000	198.96	6764717	199650	199.22	39775055		0	0	0	208.90	41707227	20800910	208.90	4345345755	1399299	200.90	9.01%	2.43%	14.27%	16.70%
17-05-2023	327284	210.08	68756456	176000	212.75	37443900		0	0	0	208.92	36769919	20952194	208.92	4377332292	1078954	212.00	5.53%	30.33%	16.31%	46.65%
18-05-2023	130417	212.78	27750022	5000	215.50	1077500		0	0	0	208.94	1044719	21077611	208.94	4404037594	941947	211.50	-0.24%	13.85%	0.53%	14.38%
21-05-2023	6400	208.40	1333776	0	0.00	0		0	0	0	0.00	0	21084011	208.94	4405371370	611958	197.70	-6.52%	1.05%	0.00%	1.05%
22-05-2023	12500	201.20	2515060	50000	178.10	8905000		0	0	0	208.94	10446956	21046511	208.94	4397439474	477672	203.20	2.78%	2.62%	10.47%	13.08%
23-05-2023	50000	214.59	10729361	32459	204.75	6646109		0	0	0	208.95	6782389	21064052	208.95	4401386466	782254	214.60	5.61%	6.39%	4.15%	10.54%
24-05-2023	10513	218.44	2296493	38997	207.00	8072403		0	0	0	208.96	8148705	21035568	208.96	4395534233	957958	223.80	4.29%	1.10%	4.07%	5.17%
25-05-2023	734	232.20	170435	35300	224.02	7907800		0	0	0	208.96	7376219	21001002	208.96	4388328449	1213665	240.20	7.33%	0.06%	2.91%	2.97%
28-05-2023	84200	243.75	20523762	0	0.00	0		0	0	0	0.00	0	21085202	209.10	4408852211	1242230	235.30	-2.04%	6.78%	0.00%	6.78%
29-05-2023	78000	225.23	17567958	7000	225.70	1579900		0	0	0	209.16	1464095	21156202	209.16	4424956073	1028527	227.70	-3.23%	7.58%	0.68%	8.26%
01-06-2023	407625	223.66	91169528	902425	214.65	193702225		0	0	0	209.43	188995425	20661402	209.43	4327130177	1990853	226.70	6.28%	20.47%	45.33%	65.80%
04-06-2023	273000	226.61	61865500	0	0.00	0		0	0	0	0.00	0	20934402	209.65	4388995677	1973737	225.10	-0.71%	13.83%	0.00%	13.83%
08-06-2023	0	0.00	0	19000	177.30	3368700		0	0	0	209.65	3983439	20915402	209.65	4385012237	716362	198.30	0.71%	0.00%	2.65%	2.65%
11-06-2023	0	0.00	0	125500	210.66	26438300		0	0	0	209.65	26311664	20789902	209.65	4358700573	1691858	217.70	9.78%	0.00%	7.42%	7.42%
12-06-2023	0	0.00	0	75721	227.55	17229969		0	0	0	209.65	15875263	20714181	209.65	4342825310	1984457	212.60	-2.34%	0.00%	3.82%	3.82%
13-06-2023	0	0.00	0	121578	216.48	26319622		0	0	0	209.65	25489399	20592603	209.65	4317335911	1422149	223.00	4.89%	0.00%	8.55%	8.55%
14-06-2023	45900	223.59	10262719	46600	228.81	10662440		0	0	0	209.69	9771353	20591903	209.69	4317827277	1010508	222.30	-0.31%	4.54%	4.61%	9.15%
15-06-2023	0	0.00	0	0	0.00	0		1700319	214.7	365058489.3	0.00	0	22292222	210.07	4682885766	679475	214.70	-3.42%	0.00%	0.00%	0.00%
18-06-2023	0	0.00	0	0	0.00	0		427579	212.2	90732263.8	0.00	0	22719801	210.11	4773618030	526171	212.20	-1.16%	0.00%	0.00%	0.00%
26-06-2023	16300	211.83	3452770	0	0.00	0		0	0	0	0.00	0	22736101	210.11	4777070800	925309	211.10	-0.33%	1.76%	0.00%	1.76%
06-07-2023	0	0.00	0	7250	206.50	1497125		0	0	0	210.11	1523294	22728851	210.11	4775547506	649986	219.50	-2.96%	0.00%	1.12%	1.12%
19-07-2023	0	0.00	0	78329	225.17	17637662		0	0	0	210.11	16457667	22650522	210.11	4759089839	1742776	231.90	6.67%	0.00%	4.49%	4.49%
30-07-2023	45443	222.15	10095101	0	0.00	0		0	0	0	0.00	0	22695965	210.13	4769184941	1079483	220.00	0.50%	4.21%	0.00%	4.21%
31-07-2023	61175	215.08	13157707	70000	217.40	15218000		0	0	0	210.15	14710284	22687140	210.15	4767632364	1359420	213.90	-2.77%	4.50%	5.15%	9.65%
02-08-2023	20000	221.01	4420283	47358	191.90	9088000		0	0	0	210.16	9952591	22659782	210.16	4762100056	2018400	220.90	5.09%	0.99%	2.35%	3.34%
07-08-2023	151571	214.11	32452740	188000	205.16	38570000		0	0	0	210.18	39514356	22623353	210.18	4755038441	741880	213.10	-0.23%	20.43%	25.34%	45.77%
08-08-2023	350000	218.17	76359952	470897	213.92	100733851		0	0	0	210.30	99031735	22502456	210.30	4732366657	1508925	217.20	1.92%	23.20%	31.21%	54.40%
10-08-2023	75000	212.00	15900000	0	0.00	0		0	0	0	0.00	0	22577456	210.31	4748266657	545229	211.00	-0.24%	13.76%	0.00%	13.76%
Total	19470818	238.99	4653345921	23197774	232.76	5399616376		0	19568668	185.38	3627560831	159.05	3689611474	22577456	210.31	4748266657					

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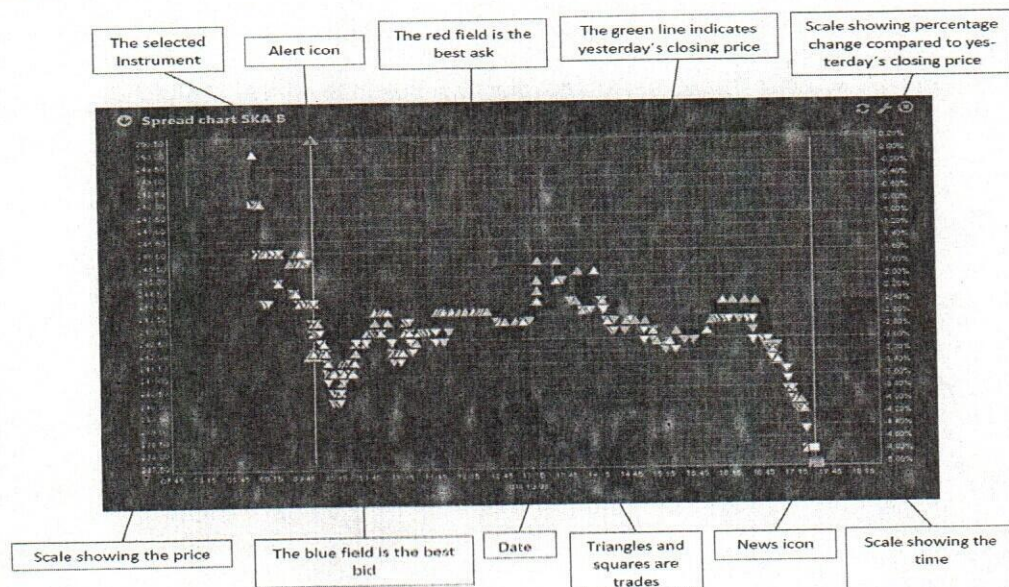
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c. Influence of Market Price of SEAPEARL by "MD. KALAM HOSSAIN AND HIS ASSOCIATES":

The enquiry team gathered trade monitoring screenshots from Surveillance Department pertaining to the public market trade of SEAPEARL conducted by "MD. KALAM HOSSAIN AND HIS ASSOCIATES". The collected data reveals instances of active trading by this group on specific dates, exerting influence on the price of SEAPEARL by conducting trade by the following BOIDs:

[1203110068826218, 1203260068826218, 1205660068826218, 1201950064794179, 1202550064794179, 1204780064794179, 1206470064794179, 1602170064794179, 1605170064794179, 1204780064808689, 1205590064808689, 1205660064808689, 1605140064808689, 1202600064808689, 1203980064815749 (combined)]

A demo of detailed information from the screenshots received from DSE surveillance system is as follows:



▲ Green triangle represents trade of SEAPEARL by "MD. KALAM HOSSAIN AND HIS ASSOCIATES"

△ White triangle represents trade of SEAPEARL by other clients

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pon thorough examination of the trade monitoring screenshots obtained from the Surveillance Department, it has been identified that "MD. KALAM HOSSAIN AND HIS ASSOCIATES" actively participated in the trading of SEAPEARL shares. Their involvement has been noted to have an impact on the pricing of these shares on multiple dates:

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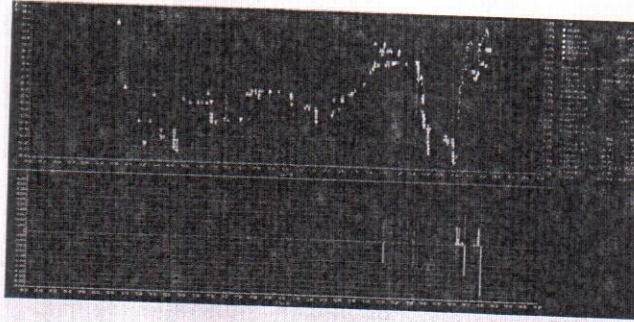
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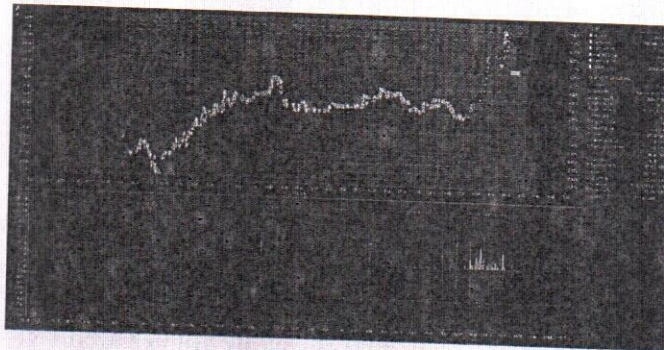
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Active Participation as on 03/01/2023:



It was observed in the above graph that on 03-01-2023, total number of trades of SEPEARL in the market was 828, whereas number of trades (buy) executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES were 201 which is approximately 24.28% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 358,334 whereas buy volume by the said client(s) was 96,263 which is approximately 26.86% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 03-01-2023 in trading of SEPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

Active Participation as on 11/01/2023:



It was observed in the above graph that on 11-01-2023, total number of trades of SEPEARL in the market was 3049, whereas number of trades (buy) executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES were 534 which is approximately 17.51% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 653,482 whereas buy volume by the said client(s) was 80,139 which is approximately 12.26% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 11-01-2023 in trading of SEPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

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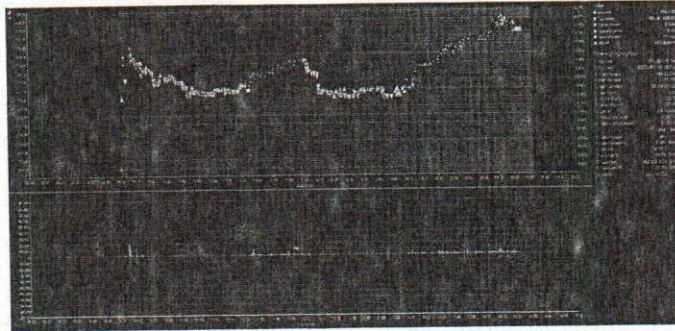
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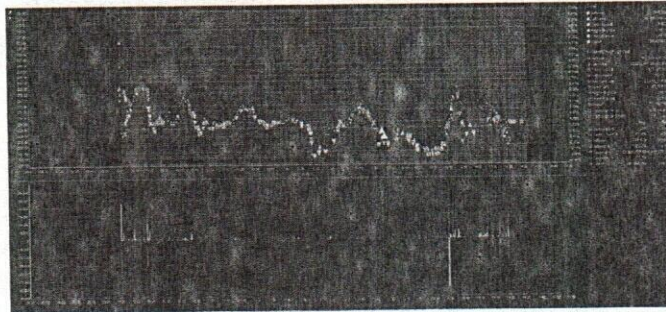
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Active Participation as on 15/01/2023:



It was observed in the above graph that on 15-01-2023, total number of trades of SEPEARL in the market was 2946, whereas number of trades (buy) executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES were 944 which is approximately 32.04% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 888,928 whereas buy volume by the said client(s) was 161,053 which is approximately 18.12% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 15-01-2023 in trading of SEPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

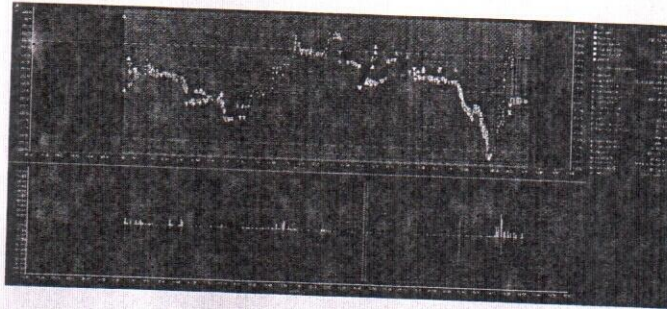
Active Participation as on 16/01/2023:



It was observed in the above graph that on 16-01-2023, total number of trades of SEPEARL in the market was 2472, whereas number of trades (buy) executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES were 554 which is approximately 22.41% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 593,538 whereas buy volume by the said client(s) was 137,570 which is approximately 23.18% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 16-01-2023 in trading of SEPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

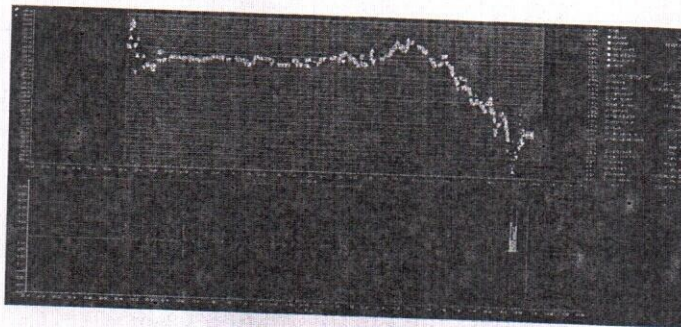
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Active Participation as on 17/01/2023:



It was observed in the above graph that on 17-01-2023, total number of trades of SEPEARL in the market was 2393, whereas number of trades (buy) executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES were 909 which is approximately 37.99% of the total number of trades in the market. Again, total traded volume of SEPEARL in the market on that day was 1,000,035 whereas buy volume by the said client(s) was 447,745 which is approximately 44.77% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 17-01-2023 in trading of SEPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

Active Participation as on 18/01/2023:



Closing price on the previous day was 230 & on 18-01-2023 was 222.7. Price decreased by 0.073% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 18-01-2023 in trading of SEPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEPEARL.

Active Participation as on 19/01/2023:



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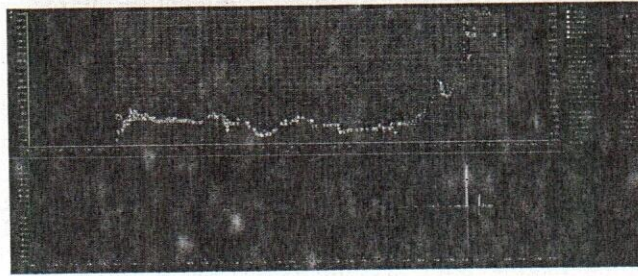
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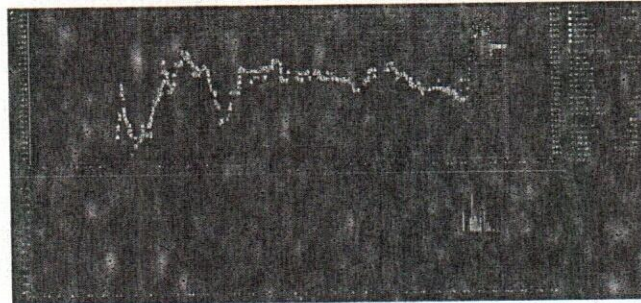
Closing price on the previous day was 222.7 & on 19-01-2023 was 228.3. Price increased by 0.056% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 19-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 22/01/2023:



Closing price on the previous day was 228.3 & on 22-01-2023 was 245. Price increased by 0.17% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 22-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 23/01/2023:



Closing price on the previous day was 245 & on 23-01-2023 was 253. Price increased by 0.08% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 23-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 24/01/2023:



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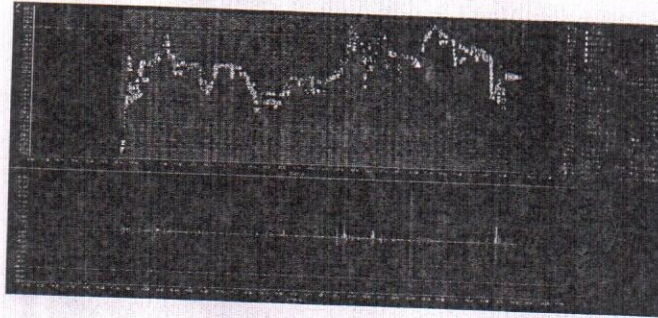
Enforcement Department

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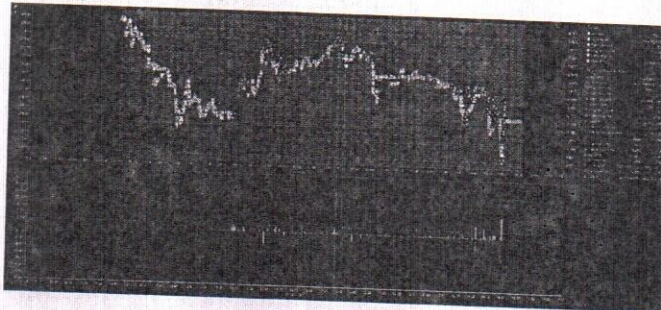
Closing price on the previous day was 253 & on 22-01-2023 was 273.7. Price increased by 0.207% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 24-01-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 25/01/2023:



Closing price on the previous day was 273.7 & on 25-01-2023 was 283.8. Price increased by 0.101% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 25-01-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 26/01/2023:



Closing price on the previous day was 283.8 & on 26-01-2023 was 275.1. Price decreased by 0.087% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 26-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 29/01/2023:



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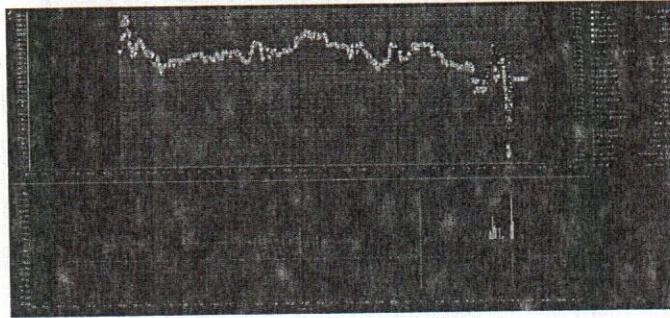
Enforcement Department

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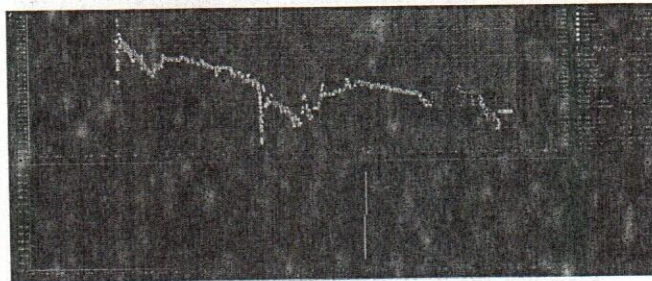
Closing price on the previous day was 275.1 & on 29-01-2023 was 283.3. Price increased by 0.082% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 29-01-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 30/01/2023:



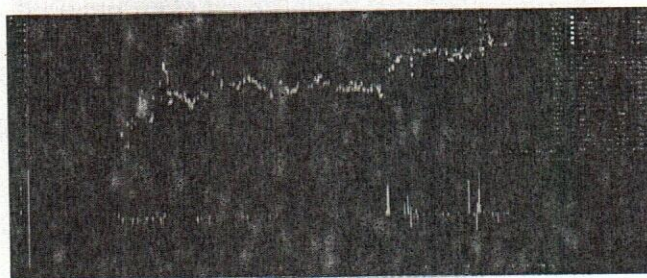
Closing price on the previous day was 283.3 & on 30-01-2023 was 280.1. Price decreased by 0.032% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 30-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 31/01/2023:



Closing price on the previous day was 280.1 & on 31-01-2023 was 263.5. Price decreased by 0.166% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 31-01-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 07/02/2023:



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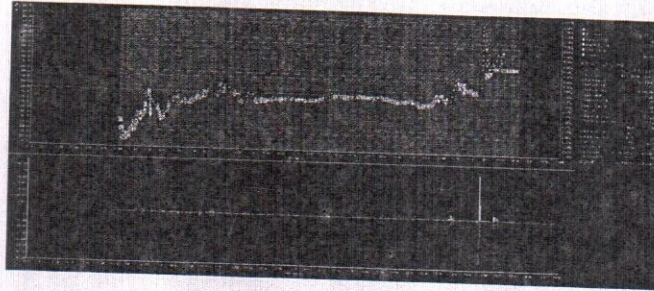
Enforcement Department

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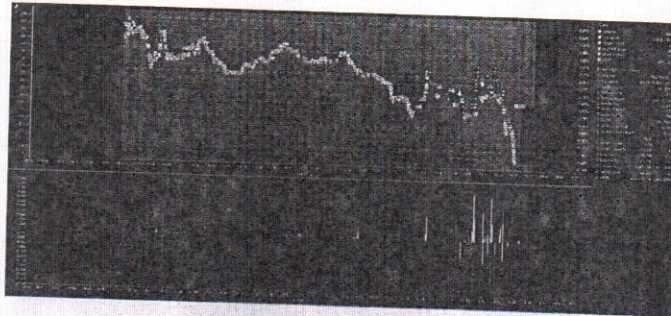
Closing price on the previous day was 272.1 & on 07-02-2023 was 284.4. Price increased by 0.123% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 07-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 08/02/2023:



Closing price on the previous day was 284.4 & on 07-02-2023 was 298.9. Price increased by 0.145% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 08-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 12/02/2023:



Closing price on the previous day was 293 & on 12-02-2023 was 283.4. Price decreased by 0.096% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 12-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 13/02/2023:



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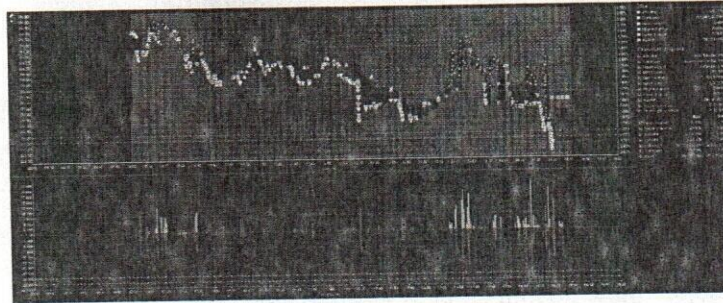
Enforcement Department

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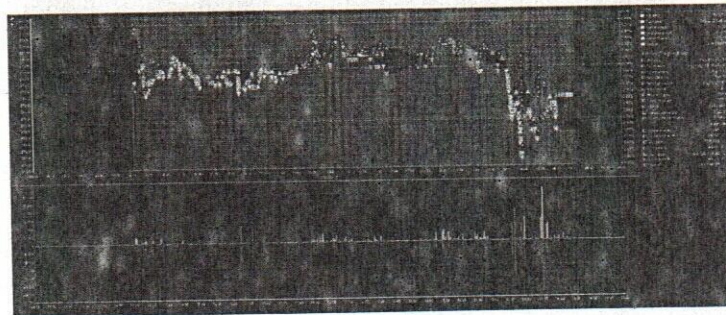
Closing price on the previous day was 283.4 & on 13-02-2023 was 288.4. Price increased by 0.05% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 13-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 14/02/2023:



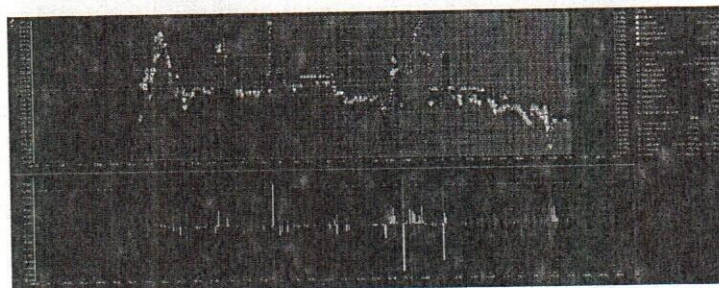
Closing price on the previous day was 288.4 & on 14-02-2023 was 282.8. Price decreased by 0.056% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 14-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 15/02/2023:



Closing price on the previous day was 282.8 & on 15-02-2023 was 276.7. Price decreased by 0.021% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 15-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

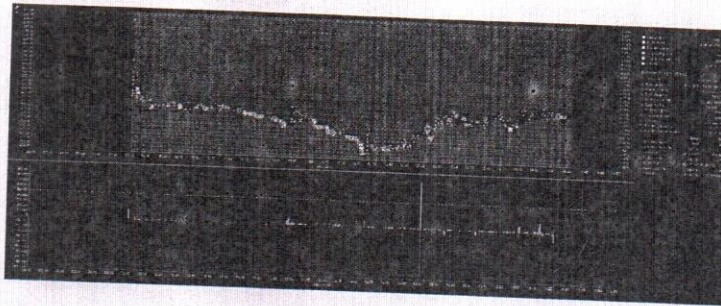
Active Participation as on 19/02/2023:



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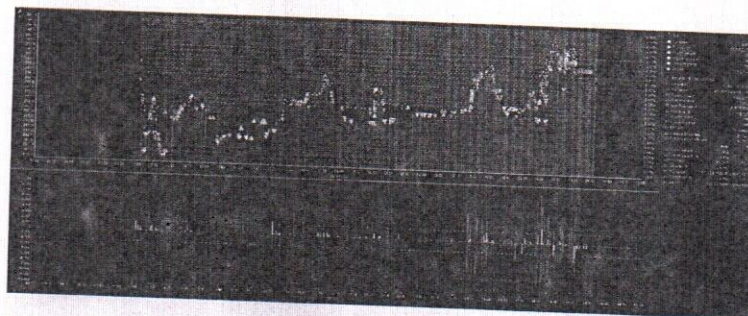
Closing price on the previous day was 278.8 & on 19-02-2023 was 279.1. Price increased by 0.061% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 19-02-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 20/02/2023:



Closing price on the previous day was 279.1 & on 20-02-2023 was 279.7. Price increased by 0.006% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 20-02-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 22/02/2023:



Closing price on the previous day was 279.7 & on 22-02-2023 was 285.1. Price increased by 0.054% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 22-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 23/02/2023:



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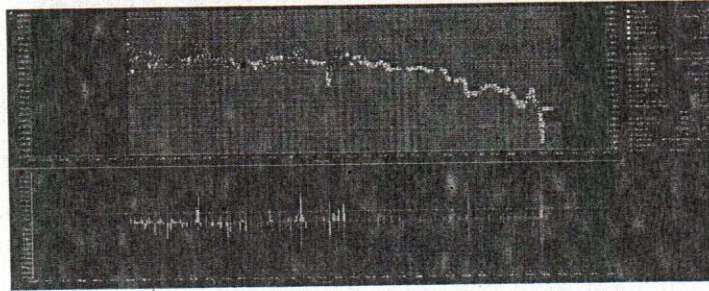
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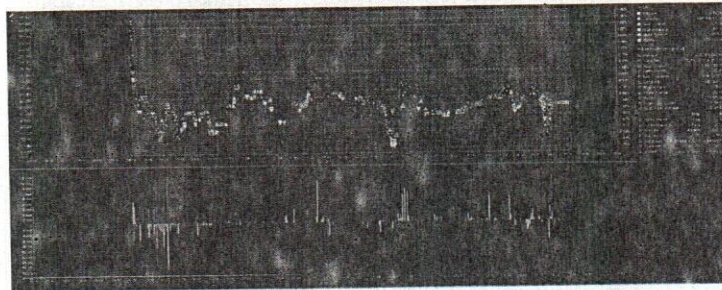
Closing price on the previous day was 285.1 & on 23-02-2023 was 287.8. Price increased by 0.027% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 23-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 26/02/2023:



Closing price on the previous day was 287.8 & on 26-02-2023 was 280.7. Price decreased by 0.061% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 07-02-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 27/02/2023:



Closing price on the previous day was 280.7 & on 27-02-2023 was 277.3. Price decreased by 0.034% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 07-02-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 28/02/2023:



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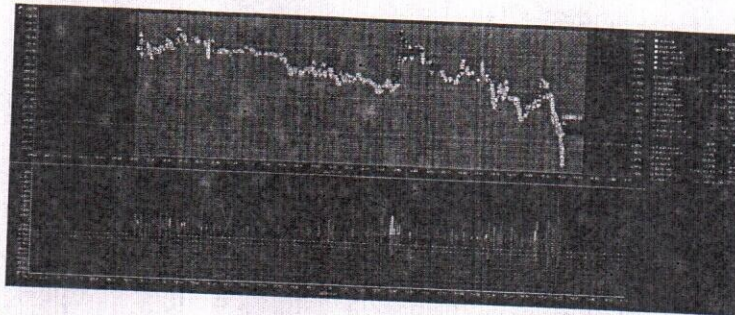
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Closing price on the previous day was 277.3 & on 28-02-2023 was 281.4. Price increased by 0.061% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 28-02-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 01/03/2023:



Closing price on the previous day was 281.4 & on 01-03-2023 was 276.3. Price decreased by 0.051% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 01-03-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 02/03/2023:



Closing price on the previous day was 276.3 & on 02-03-2023 was 275.2. Price decreased by 0.011% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 02-03-2023 in trading of SEAPEARL share. These trades were executed specially during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 05/03/2023:

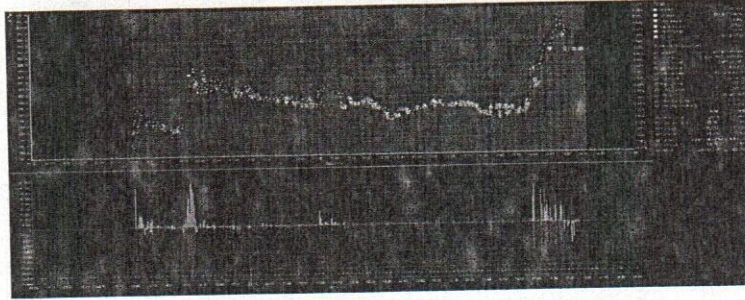


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Market, Market Intermediaries and Other Affairs Section
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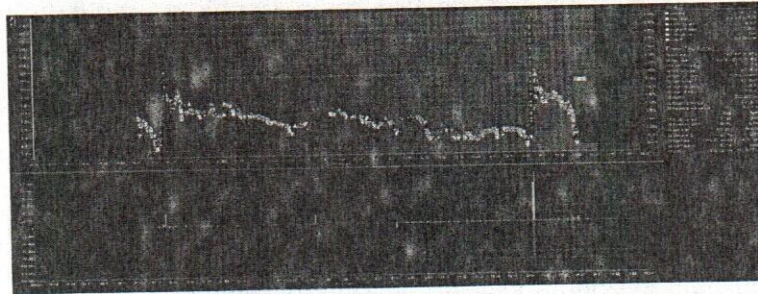
Closing price on the previous day was 275.2 & on 05-03-2023 was 290.6. Price increased by 0.154% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 05-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 06/03/2023:



Closing price on the previous day was 290.6 & on 06-03-2023 was 306. Price increased by 0.154% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 06-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 09/03/2023:



Closing price on the previous day was 306 & on 09-03-2023 was 320.1. Price increased by 0.141% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 09-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 12/03/2023:



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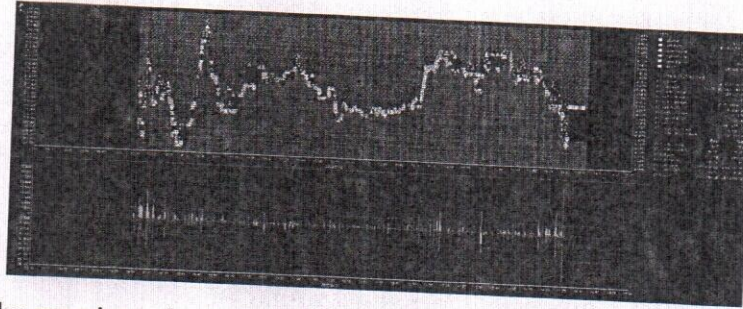
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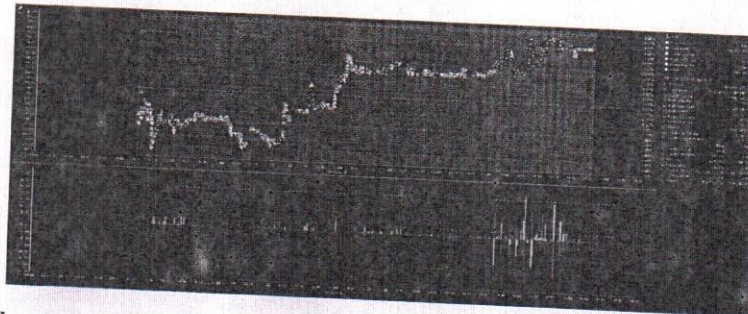
Closing price on the previous day was 320.1 & on 12-03-2023 was 311.8. Price decreased by 0.083% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 12-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 13/03/2023:



Closing price on the previous day was 311.8 & on 13-03-2023 was 311.6. Price decreased by 0.002% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 13-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 16/03/2023:



Closing price on the previous day was 311.6 & on 16-03-2023 was 308.2. Price decreased by 0.034% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 16-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 19/03/2023:



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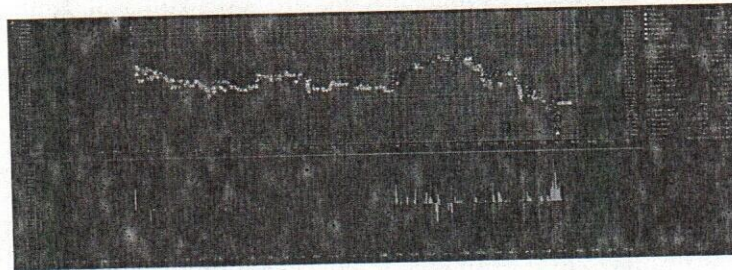
Closing price on the previous day was 308.2 & on 19-03-2023 was 312.7. Price increased by 0.045% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 19-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 21/03/2023:



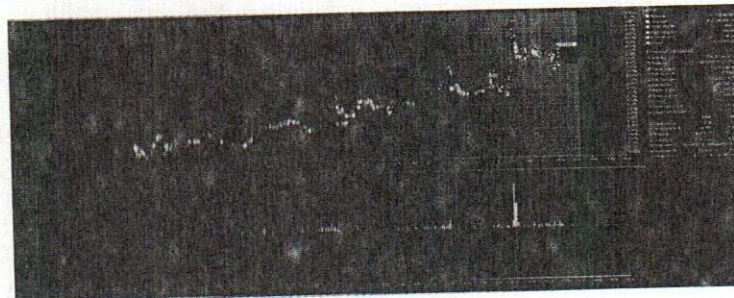
Closing price on the previous day was 312.7 & on 21-03-2023 was 304.1. Price decreased by 0.086% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 21-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 22/03/2023:



Closing price on the previous day was 304.1 & on 22-03-2023 was 304.4. Price increased by 0.003% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 22-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 23/03/2023:



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Closing price on the previous day was 304.4 & on 23-03-2023 was 316.9. Price increased by 0.125% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 23-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 28/03/2023:



Closing price on the previous day was 308.5 & on 28-03-2023 was 302.8. Price decreased by 0.057% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 28-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 30/03/2023:



Closing price on the previous day was 293.5 & on 30-03-2023 was 295.6. Price increased by 0.002% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 30-03-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 10/04/2023:

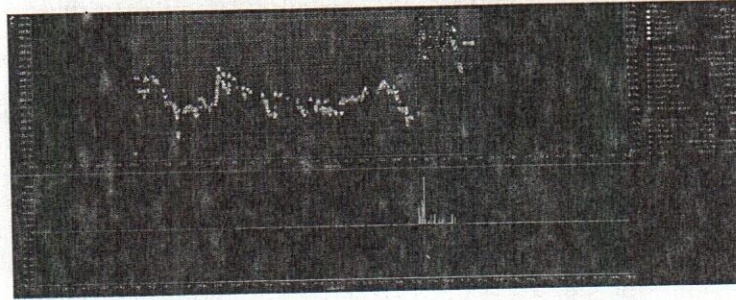


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Market, Market Intermediaries and Other Affairs Section
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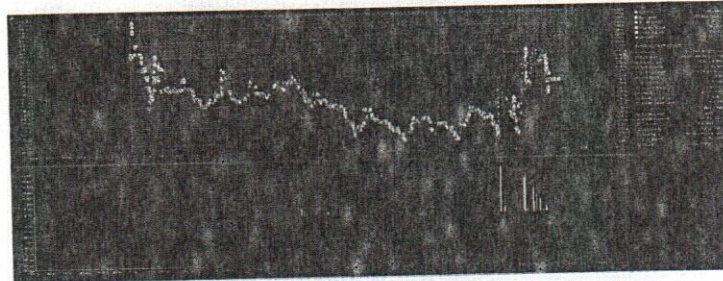
Closing price on the previous day was 287.7 & on 10-03-2023 was 287.5. Price decreased by 0.002% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 10-04-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 12/04/2023:



Closing price on the previous day was 286 & on 12-04-2023 was 288. Price increased by 0.02% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 12-04-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

Active Participation as on 26/04/2023:



Closing price on the previous day was 303.5 & on 26-04-2023 was 299.1. Price decreased by 0.044% on this day. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 26-04-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

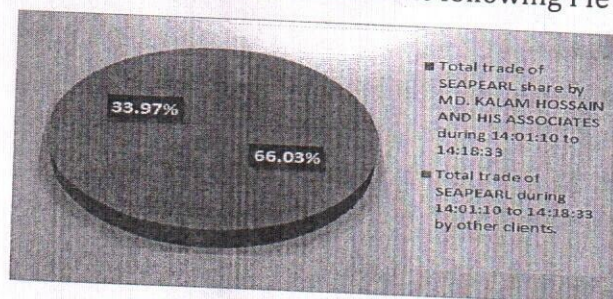
A handwritten signature or mark, possibly a stylized 'A' or 'S', located at the bottom right of the page.

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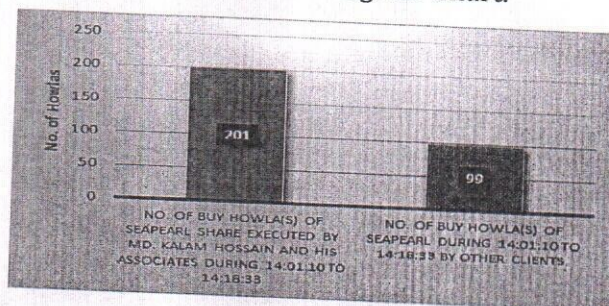
d. Manipulation:

Manipulation of market price as on 03-01-2023:

On 03-01-2023, the trading of SEAPEARL shares commenced at Tk. 185.00, marking a Tk. 1.90 increase from the Yearly Compound Percentage (YCP) of Tk. 183.10. Notably, on that day, MD. KALAM HOSSAIN AND HIS ASSOCIATES initiated a series of trades starting at 14:01:10 with a price of Tk. 182.40, and influenced the price to escalate to Tk. 185.00 by 14:18:33. The accompanying graph illustrates the substantial trades executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES during this specific time frame. It is noteworthy that from 14:01:10 to 14:18:33, MD. KALAM HOSSAIN AND HIS ASSOCIATES purchased 96,263 shares of SEAPEARL, constituting a significant portion of the total traded shares amounting to 145,776. This distribution is visually represented in the following Pie Chart.



It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 201 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 300 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 66.03% of the total trades of SEAPEARL shares by executing 201 of total 300 howlas from 14:01:10 to 14:18:33 on 03-01-2023. From 14:01:10 to 14:18:33, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 182.40 to Tk. 185.00. Thus, it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 1.40 which is approximately 0.76% higher than YCP.

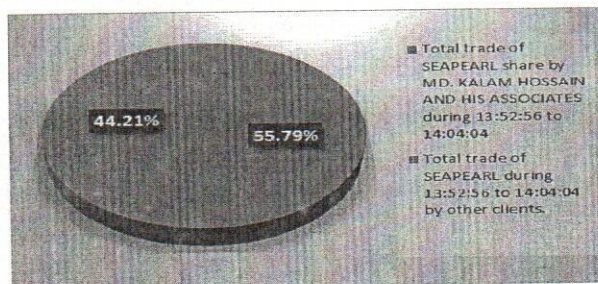
Manipulation of market price as on 11-01-2023:

On 11-01-2023, the trading of SEAPEARL shares commenced at Tk. 209.40, marking a Tk. 2.30 increase from the Yearly Compound Percentage (YCP) of Tk. 207.10. Notably, on that day, MD. KALAM HOSSAIN AND HIS ASSOCIATES initiated a series of trades starting at

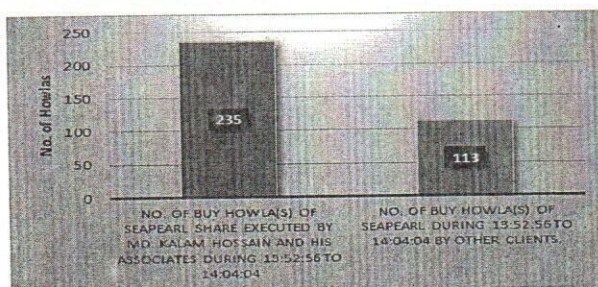
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13:52:56 with a price of Tk. 212.90, and influenced the price to escalate to Tk. 218.00 by 14:04:04. The accompanying graph illustrates the substantial trades executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES during this specific time frame. It is noteworthy that from 13:52:56 to 14:04:04, MD. KALAM HOSSAIN AND HIS ASSOCIATES purchased 47,424 shares of SEAPEARL, constituting a significant portion of the total traded shares amounting to 85,012. This distribution is visually represented in the following Pie Chart.



It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 235 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 348 as shown in the following Bar Chart.

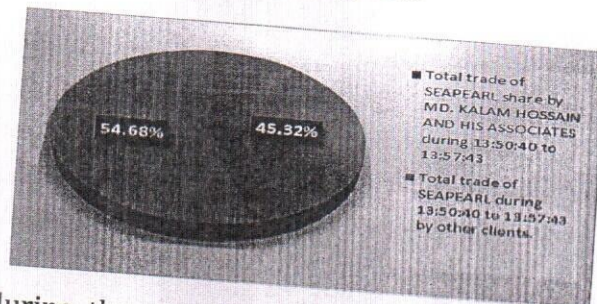


It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 55.79% of the total trades of SEAPEARL shares by executing 235 of total 348 howlas from 13:52:56 to 14:04:04 on 11-01-2023. From 13:52:56 to 14:04:04, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 212.90 to Tk. 218.00. Thus, it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 11.20 which is approximately 5.41% higher than YCP.

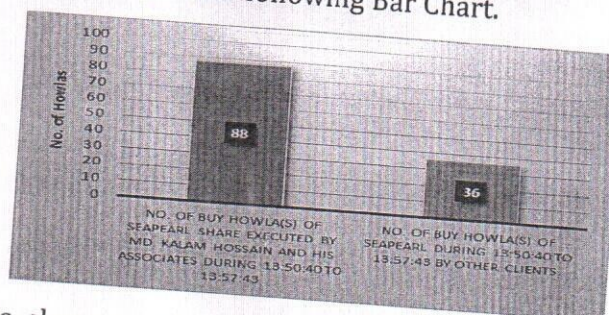
Manipulation of market price as on 15-01-2023:

On 15-01-2023, the trading of SEAPEARL shares commenced at Tk. 212.00, indicating a Tk. 11.00 decrease from the Yearly Compound Percentage (YCP) of Tk. 223.00. Notably, on that day, MD. KALAM HOSSAIN AND HIS ASSOCIATES initiated a series of trades starting at 13:50:40 with a price of Tk. 226.60, and influenced the price to change slightly to Tk. 226.50 by 13:57:43. The accompanying graph illustrates the substantial trades executed by MD. KALAM HOSSAIN AND HIS ASSOCIATES during this specific time frame. It is noteworthy that from 13:50:40 to 13:57:43, MD. KALAM HOSSAIN AND HIS ASSOCIATES purchased 7,706 shares of SEAPEARL, constituting a significant portion of the total traded shares amounting to 17,004. This distribution is visually represented in the following Pie Chart.

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Market, Market Intermediaries and Other Affairs Section
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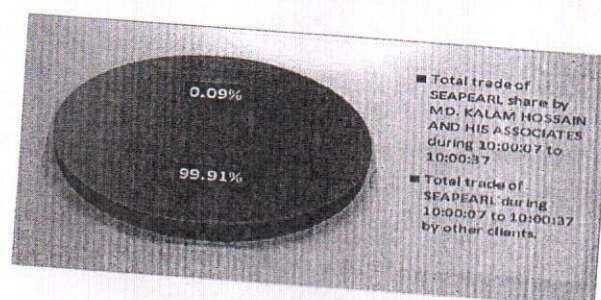
It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 88 howls to purchase of shares of SEAPEARL compared to the total number of howls of 124 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 45.32% of the total trades of SEAPEARL shares by executing 88 of total 124 howls from 13:50:40 to 13:57:43 on 15-01-2023. From 13:50:40 to 13:57:43, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 226.60 to Tk. 226.50. Thus, it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 4.60 which is approximately 2.06% higher than YCP.

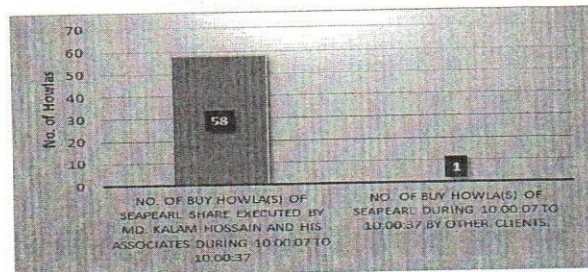
Manipulation of market price as on 16-01-2023:

On 16-01-2023, trading of SEAPEARL share was started at Tk. 234.90 which is Tk. 7.30 more than the YCP of Tk. 227.60. On that day, MD. KALAM HOSSAIN AND HIS ASSOCIATES started series of trading at 10:00:07 at price Tk. 234.90 and induced the same to rise to Tk. 239.00 up to 10:00:37. It can also be observed from the above graph that MD. KALAM HOSSAIN AND HIS ASSOCIATES executed significant trades during this time period. It is mentionable here that from 10:00:07 to 10:00:37, MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 21,831 shares of SEAPEARL compared to the total traded share of 21,851. This is shown in the following Pie Chart.



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Market, Market Intermediaries and Other Affairs Section
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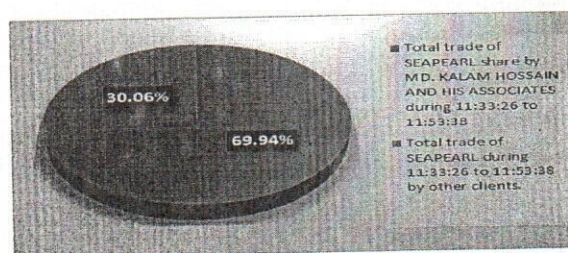
It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 58 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 59 as shown in the following Bar Chart.



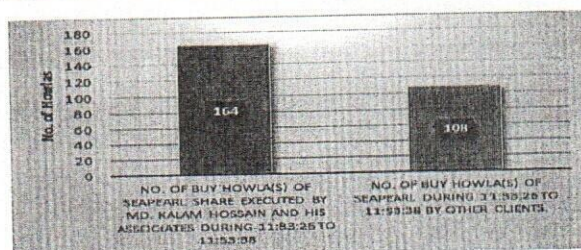
It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 99.91% of the total trades of SEAPEARL shares by executing 58 of total 59 howlas from 10:00:07 to 10:00:37 on 16-01-2023. From 10:00:07 to 10:00:37, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 234.90 to Tk. 239.00. Thus, it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share.

Manipulation of market price as on 17-01-2023:

On 17-01-2023, trading of SEAPEARL share was started at Tk. 234.90 which is Tk. 5.10 more than the YCP of Tk. 229.80. On that day, MD. KALAM HOSSAIN AND HIS ASSOCIATES started series of trading at 11:33:26 at price Tk. 229.80 and induced the same to rise to Tk. 234.00 up to 11:53:38. It can also be observed from the above graph that MD. KALAM HOSSAIN AND HIS ASSOCIATES executed significant trades during this time period. It is mentionable here that from 11:33:26 to 11:53:38, MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 71,363 shares of SEAPEARL compared to the total traded share of 102,041. This is shown in the following Pie Chart.



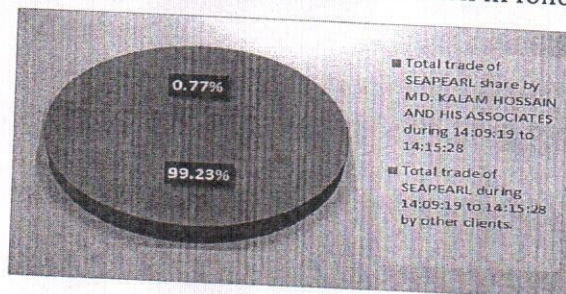
It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 164 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 272 as shown in the following Bar Chart.



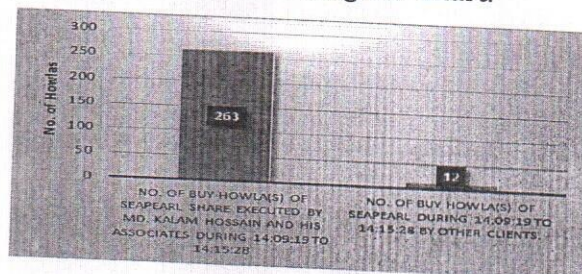
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 Enforcement Division
 Enforcement Department
 Market, Market Intermediaries and Other Affairs Section
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It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 69.94% of the total trades of SEAPEARL shares by executing 164 of total 272 howlas from 11:33:26 to 11:53:38 on 17-01-2023. From 11:33:26 to 11:53:38, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 229.80 to Tk. 234.00. Thus it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share.

Again on 17-01-2023, MD. KALAM HOSSAIN AND HIS ASSOCIATES started series of trading at 14:09:19 at price Tk. 226.80 and induced the same to rise to Tk. 233.40 up to 14:15:28. It can also be observed from the above graph that MD. KALAM HOSSAIN AND HIS ASSOCIATES executed significant trades during this time period. It is mentionable here that from 14:09:19 to 14:15:28, MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 148,008 shares of SEAPEARL compared to the total traded share of 149,159. This is shown in following Pie Chart.



It is also found that during the aforementioned period, MD. KALAM HOSSAIN AND HIS ASSOCIATES executed 263 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 275 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that MD. KALAM HOSSAIN AND HIS ASSOCIATES bought 99.23% of the total trades of SEAPEARL shares by executing 263 of total 275 howlas from 14:09:19 to 14:15:28 on 17-01-2023. From 14:09:19 to 14:15:28, MD. KALAM HOSSAIN AND HIS ASSOCIATES induced the price to rise from Tk. 226.80 to Tk. 233.40. Thus it seems that MD. KALAM HOSSAIN AND HIS ASSOCIATES were actively trying to lift the price of SEAPEARL share during the closing session and affecting the close price of the day.

Apart from the above-mentioned dates MD. KALAM HOSSAIN AND HIS ASSOCIATES also executed manipulations in more days. The enquiry team found their manipulation in other days like 18/01/23, 19/01/2023, 22/01/2023, 23/01/2023, 24/01/2023, 25/01/2023, 26/01/2023, 29/01/2023, 30/01/2023, 31/01/2023, 07/02/2023, 08/02/2023, 12/02/2023, 13/02/2023, 14/02/2023, 15/02/2023, 19/02/2023, 20/02/2023, 22/02/2023, 23/02/2023, 26/02/2023, 27/02/2023, 28/02/2023, 01/03/2023, 02/03/2023, 05/03/2023, 06/03/2023, 09/03/2023, 12/03/2023, 13/03/2023, 16/03/2023, 19/03/2023, 21/03/2023, 22/03/2023, 23/03/2023, 28/03/2023, 30/03/2023, 10/04/2023, 12/04/2023, 26/04/2023 as mentioned in observation.

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e. Public Market Internal Transection:

Report of internal transection of sea pearl (Public Market)

Buyer Name	Buyer BOID	Seller Name	Seller BOID	No. Transection	Trade Volume	Trade Amount	Market Type
UDC Constraction Ltd.	1602170064794179	Venus Builders Ltd.	1202600064808689	1	76000	16074000	Public
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	17	4760	1394428	Public
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	1	100	21200	Public
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	1	50000	10720000	Public
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	115	149806	43131780	Public
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	5	2964	918754	Public

- Buyer: UDC CONSTRUCTION LTD. (1602170064794179) and Seller: VENUS BUILDERS LTD. (1205660064808689) 1 internal transactions of 76,000 volume of share amounting Tk. 1,607,4000.
- Buyer: VENUS BUILDERS LTD. 1202600064808689 and seller: UDC CONSTRUCTION LTD. (1201950064794179) 17 internal transactions of 4,760 volume of share amounting Tk. 1,394,428, UDC CONSTRUCTION LIMITED (1203260068826218) 1 internal transactions of 100 volume of share amounting Tk. 21,200, UDC CONSTRUCTION LTD. (1602170064794179) 1 internal transactions of 50,000 volume of share amounting Tk. 10,720,000.
- Buyer: VENUS BUILDERS LTD. (1204780064808689) and seller: UDC CONSTRUCTION LTD. (1201950064794179) 115 internal transactions of 149,806 volume of share amounting Tk. 4,31,31,780.
- Buyer: VENUS BUILDERS LTD. (1205590064808689) and seller: UDC CONSTRUCTION LTD. (1201950064794179) 5 internal transactions of 2,964 volume of share amounting Tk. 9,18,754.

Report of internal transection of sea pearl (Block Market)

Buyer Name	Buyer BOID	Seller Name	Seller BOID	No. Transection	Trade Volume	Trade Amount	Market Type
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	1	116000	22504000	Block
Venus Builders Ltd.	1202600064808689	UDC Constraction Ltd.	1602170064794179	1	500000	111350000	Block
Total				2	616000	133854000	

- Buyer: VENUS BUILDERS LTD. (1204780064808689) and seller: UDC CONSTRUCTION LTD. (1602170064794179) conducted 1 internal transaction with a total volume of 116,000 shares amounting Tk. 22,504,000, UDC Construction Ltd. (1201950064794179) conducted 1 internal transaction with a total volume of 500,000 shares amounting Tk. 111,350,000 of SEA PEARL in the Block market.

Total conducted 2 internal transactions with a total volume of 616,000 shares total amounting Tk. 133,854,000 of SEA PEARL in the Block market.

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**f. Total Gain and Loss by Md. Kalam Hossain and His Associates form
01.07.2022 to 10.08.2023**

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
1458985	228.22	332972915.00	16769740	239.54	4017065796.70	19470818	238.99	4653345921.00	23197774	232.76	5399616376.10	159.05	3689611473.58	22577456	210.31	4748266657.17

Realized Capital gain(loss)per unit	73.71	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	46.35%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	171,00,04,903	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (10-08-2023)	211.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	0.69	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	0.33%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	15,576,559	Quantity of Stock Positon x Unrealized gain (loss) per unit

Individual Effects and Gain-Loss of UDC Construction Ltd.:

I. Effects of "SEAPEARL" at DSE by UDC Construction Ltd: (Both Public and Block Market)

Date	Buy			Sale			Share Credited	Shares Received/ Transfer			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount		Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance																					
06-09-2022	5000	68.30	341500	0	0.00	0		0	0	0	0.00	0	1008440	52.15	52585855						
18-10-2022	0	0.00	0	0	0.00	0		0	0	0	0.00	0	1013440	52.23	52927355	2917444	68.90	9.89%	0.17%	0.00%	0.17%
20-10-2022	0	0.00	0	0	0.00	0		1013440	134.2	136003648	0.00	0	1013440	52.23	52927355	2917444	68.90	9.89%	0.17%	0.00%	0.17%
23-10-2022	169301	150.46	25472209	0	0.00	0		2400000	139.6	335040000	0.00	0	2026880	93.21	188931003	925852	134.20	2.05%	0.00%	0.00%	0.00%
24-10-2022	110515	153.87	17004669	0	0.00	0		2500000	139.6	349000000	0.00	0	4426880	118.36	523971003	1189284	139.60	3.33%	0.00%	0.00%	0.00%
25-10-2022	297033	154.74	45964059	0	0.00	0		0	0	0	0.00	0	7096181	126.61	898443212	2808577	150.60	7.88%	6.03%	0.00%	6.03%
26-10-2022	125000	159.70	19962500	0	0.00	0		0	0	0	0.00	0	7206696	127.03	915447881	961272	153.10	1.66%	1.50%	0.00%	11.50%
27-10-2022	200151	175.20	35065685	0	0.00	0		0	0	0	0.00	0	7503729	128.12	961411940	837458	154.80	1.11%	6.17%	0.00%	16.17%
30-10-2022	299000	167.00	49932521	0	0.00	0		0	0	0	0.00	0	7628729	128.64	981374440	2858310	168.70	8.98%	4.37%	0.00%	4.37%
31-10-2022	51878	184.35	9563925	0	0.00	0		0	0	0	0.00	0	7828880	129.83	1016440125	3049412	169.00	0.18%	6.56%	0.00%	6.56%
02-11-2022	36122	192.90	6967934	0	0.00	0		0	0	0	0.00	0	8127880	131.20	1066372646	2426182	173.70	2.78%	12.32%	0.00%	12.32%
06-11-2022	0	0.00	0	900000	185.00	166500000		0	0	0	0.00	0	8179758	131.54	1075936571	2082485	187.50	-1.52%	2.94%	0.00%	2.94%
08-11-2022	20000	174.19	3483843	0	0.00	0		0	0	0	0.00	0	8215880	131.81	1082904505	1229961	187.50	-1.52%	2.94%	0.00%	2.94%
13-11-2022	0	0.00	0	100000	178.50	17850000		1200000	169.2	203040000	0.00	0	8315880	131.81	1082904505	1229961	187.50	-1.52%	2.94%	0.00%	2.94%
14-11-2022	0	0.00	0	0	0.00	0		0	0	0	0.00	0	8535880	137.16	1170802704	1007159	169.20	-4.30%	1.99%	0.00%	1.99%
15-11-2022	280000	176.96	49549515	0	0.00	0		500000	182.5	91250000	0.00	0	8935880	137.16	1170802704	1007159	169.20	-4.30%	1.99%	0.00%	1.99%
27-11-2022	0	0.00	0	39401	170.00	6698170		0	0	0	0.00	0	9215880	139.70	1248336454	1822038	182.50	0.66%	0.00%	0.00%	0.00%
28-11-2022	18000	177.04	3186688	0	0.00	0		0	0	0	0.00	0	9350800	140.83	1297885969	805993	180.40	-1.15%	34.74%	0.00%	34.74%
29-11-2022	82000	179.60	14727200	225003	171.72	38636516		0	0	0	0.00	0	9215880	140.83	1297885969	805993	180.40	-1.15%	34.74%	0.00%	34.74%
30-11-2022	24000	187.07	4489710	0	0.00	0		0	0	0	0.00	0	9194479	140.90	1295523756	547693	175.90	-1.46%	3.29%	0.00%	3.29%
01-12-2022	175700	183.95	32319930	0	0.00	0		0	0	0	0.00	0	9194479	140.90	1295523756	547693	175.90	-1.46%	3.29%	0.00%	3.29%
05-01-2023	0	0.00	0	42800	212.19	9081613		0	0	0	0.00	0	9051476	141.24	1278470536	991251	183.80	4.49%	8.27%	0.00%	8.27%
08-01-2023	0	0.00	0	116000	194.00	22504000		0	0	0	0.00	0	9075476	141.37	1282960246	731938	187.10	1.80%	3.28%	0.00%	3.28%
09-01-2023	0	0.00	0	0	0.00	0		0	0	0	0.00	0	9251176	142.17	1315280176	691189	178.40	-4.65%	25.42%	0.00%	25.42%
12-01-2023	0	0.00	0	0	0.00	0		500	147.91	73955	0.00	0	9251176	142.17	1315280176	691189	178.40	-4.65%	25.42%	0.00%	25.42%
16-01-2023	26997	230.38	6219440	32280	229.01	7392600		1211500	223.21	270164800	0.00	0	9092376	142.17	1292702896	996094	214.00	0.85%	0.00%	11.65%	11.65%
17-01-2023	234936	230.76	54213119	260000	212.75	55316000		0	0	0	0.00	0	9092376	142.17	1292702896	996094	214.00	0.85%	0.00%	11.65%	11.65%
19-01-2023	217652	228.23	49674156	961135	216.29	207884922		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
22-01-2023	486763	243.73	118638133	212054	219.10	46461880		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
23-01-2023	0	0.00	0	39000	230.10	8973900		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
24-01-2023	37020	267.63	9907736	11100	256.85	2851050		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
25-01-2023	58750	285.79	16789896	60952	277.68	16925041		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
26-01-2023	97300	278.78	27125721	27927	282.36	7885573		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
29-01-2023	192252	286.92	55160946	218422	271.77	59361056		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
31-01-2023	346574	269.57	93425296	306053	270.10	82663780		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%
01-02-2023	48498	269.64	13077098	102191	254.14	25970044		0	0	0	0.00	0	10304376	151.60	1562941341	839048	223.00	-0.93%	0.00%	0.00%	0.00%

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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05-02-2023	15623	262.54	4101681	24463	264.92	6480816	0	0	0	168.44	4120570	9811164	168.44	1652601530	903688	261.60	-3.47%	1.73%	2.71%	4.44%
06-02-2023	90710	271.57	24634218	300000	266.80	80040914	0	0	0	169.39	50815707	9601874	169.39	1626420041	1932953	272.10	4.01%	4.69%	15.52%	20.21%
07-02-2023	217125	283.22	61494159	406164	271.63	110325861	0	0	0	171.90	69820761	9412835	171.90	1618093438	1671846	284.40	4.52%	12.99%	24.29%	37.28%
08-02-2023	311235	297.96	92735498	106762	279.76	29867726	0	0	0	175.94	18783441	9617308	175.94	1692045492	1555248	298.90	5.10%	20.01%	6.86%	26.88%
09-02-2023	41819	303.82	12705410	15000	303.00	4545000	0	0	0	176.49	26473368	9644127	176.49	1702103534	792796	293.00	-1.97%	5.27%	1.89%	7.17%
12-02-2023	90383	287.27	25964523	38849	284.00	11033100	0	0	0	177.52	6896466	9695661	177.52	1721171592	715743	283.40	-3.28%	2.63%	5.43%	18.06%
13-02-2023	425343	287.18	122150516	433405	279.32	121057928	0	0	0	182.13	78933552	9687599	182.13	1764386755	1552287	288.40	1.76%	27.40%	27.92%	55.32%
14-02-2023	80094	286.98	22985277	5300	287.36	1523022	0	0	0	182.99	969837	9762393	182.99	1786402194	660371	282.80	-1.94%	12.13%	0.80%	12.93%
15-02-2023	83522	279.77	23366965	0	0.00	0	0	0	0	0.00	0	9845915	183.81	1809769159	573827	276.70	-2.16%	4.56%	0.00%	14.56%
16-02-2023	22791	280.97	6403603	15000	278.80	4182000	0	0	0	184.03	2760503	9853706	184.03	1813412259	356706	278.80	0.76%	6.39%	4.21%	10.59%
19-02-2023	90529	281.95	25524540	81304	279.83	22751347	0	0	0	184.92	15035135	9862931	184.92	1823901664	527297	279.10	0.11%	17.17%	15.42%	32.59%
20-02-2023	202462	278.07	56298339	184927	276.29	51092565	0	0	0	186.80	34544080	9880466	186.80	1845655923	1003249	279.70	0.21%	20.18%	18.43%	38.61%
22-02-2023	39282	283.71	11144799	36895	278.29	10267515	0	0	0	187.18	6906099	9882853	187.18	1849894632	450978	285.10	1.93%	8.71%	8.18%	16.89%
23-02-2023	93166	286.91	26730004	96949	279.31	27078941	0	0	0	188.11	18237423	9879070	188.11	1858387212	573494	287.80	0.95%	6.25%	16.90%	33.15%
26-02-2023	136926	290.74	39809749	122836	287.19	35276664	0	0	0	189.52	23279454	9893160	189.52	1874917507	704429	280.70	-2.47%	19.44%	17.44%	36.88%
27-02-2023	149446	278.44	41612467	139370	276.55	38543235	0	0	0	190.84	26597358	9902336	190.84	1889932617	722688	277.30	-1.21%	19.06%	17.09%	36.15%
28-02-2023	171713	280.40	48148533	153931	275.31	42378597	0	0	0	192.37	29611144	9921018	192.37	1908470005	900763	281.40	1.48%	19.06%	17.09%	36.15%
01-03-2023	12200	280.54	3422532	117785	259.51	30566290	0	0	0	192.47	22670625	9815433	192.47	1889221912	903752	276.30	-1.81%	1.35%	13.03%	14.38%
02-03-2023	82361	275.04	22652613	156218	270.91	42320351	0	0	0	193.16	30175331	9741576	193.16	1881699194	985233	275.20	-0.40%	8.36%	15.86%	24.22%
03-03-2023	101212	291.29	29481734	413731	275.68	114056409	2598470	155.39	103776253.3	186.07	76983336	12027527	186.07	2237973845	3046347	290.60	5.60%	3.32%	13.58%	16.90%
06-03-2023	207180	302.19	62607630	200538	296.09	59378164	0	0	0	188.04	37708627	12034169	188.04	2262872848	1691460	306.00	5.30%	12.25%	11.86%	24.10%
07-03-2023	54356	313.17	17022565	250000	289.07	72268100	0	0	0	188.60	47149992	11838525	188.60	2232745421	1564610	313.30	2.39%	3.47%	15.98%	19.45%
09-03-2023	314091	321.37	100940913	56012	316.09	17704901	0	0	0	192.03	10756074	12096604	192.03	2322930261	822159	320.10	2.17%	38.20%	6.81%	45.02%
12-03-2023	154412	315.08	48651688	40503	312.78	12668385	0	0	0	193.58	7840671	12210513	193.58	2363741278	740580	311.80	-2.59%	20.85%	5.47%	26.32%
13-03-2023	77498	312.49	24217724	30836	312.83	9646396	0	0	0	194.33	5992435	12257175	194.33	2381966567	543444	311.60	-0.06%	14.26%	5.67%	19.93%
14-03-2023	31999	316.19	10117879	76150	306.62	23349425	0	0	0	194.65	14822577	12213024	194.65	2377261869	1038252	312.50	0.29%	3.08%	7.33%	10.42%
15-03-2023	53560	306.16	16397850	0	0.00	0	0	0	0	0.00	0	12266584	195.14	2393659719	673995	295.50	-5.44%	7.95%	0.00%	7.95%
16-03-2023	159957	308.14	49289547	186212	302.54	56336272	0	0	0	196.59	36607650	12240329	196.59	2406341615	1625237	308.20	4.30%	9.84%	11.46%	21.30%
19-03-2023	29905	314.72	9411842	0	0.00	0	0	0	0	0.00	0	12270234	196.88	2415753457	959459	312.70	1.46%	3.12%	0.00%	3.12%
20-03-2023	1515	305.01	462090	50001	295.00	14750295	0	0	0	196.89	9844823	12221748	196.89	2406370724	638941	303.90	-2.81%	0.24%	7.83%	8.06%
21-03-2023	129980	304.35	39559421	99996	286.43	28641893	0	0	0	198.02	19801540	12251732	198.02	2426128605	1266228	304.40	0.16%	0.27%	7.90%	18.16%
22-03-2023	26433	309.59	8183493	718954	281.18	202152238	0	0	0	198.26	142542344	11559211	198.26	2291769754	1282425	304.10	-0.10%	2.06%	56.06%	58.12%
23-03-2023	461155	313.45	144549479	362750	289.06	104857875	0	0	0	202.68	73523119	11657616	202.68	2362796114	1499564	316.90	4.21%	30.75%	24.19%	54.94%
27-03-2023	9475	319.33	3025648	24768	300.02	7430977	0	0	0	202.78	5022389	11642323	202.78	2360799373	581648	308.50	-2.65%	1.63%	4.26%	5.89%
28-03-2023	43018	302.48	13011925	0	0.00	0	0	0	0	0.00	0	11685341	203.14	2373811298	786875	302.80	-1.85%	5.47%	0.00%	5.47%
29-03-2023	27379	303.74	8316182	15393	303.36	4669650	0	0	0	203.38	3130621	11697327	203.38	2378996858	511444	293.50	-3.07%	5.35%	3.01%	8.36%
30-03-2023	57592	295.41	17013436	50000	279.25	13962500	0	0	0	203.83	10191522	11704919	203.83	2385818772	694081	295.60	0.72%	8.30%	7.20%	15.50%
02-04-2023	5534	291.83	1614987	995	289.20	287754	0	0	0	203.87	202853	11709458	203.87	2387230906	650392	287.80	-0.21%	11.32%	11.23%	22.55%
03-04-2023	100815	289.50	29185649	99999	262.70	26269737	0	0	0	204.60	20460089	11710274	204.60	2395956467	907071	287.20	-0.21%	11.32%	11.23%	22.55%
09-04-2023	1100	284.77	313243	0	0.00	0	0	0	0	0.00	0	11711374	204.61	2396269710	1010600	287.70	2.31%	0.11%	0.00%	0.11%
10-04-2023	8087	286.99	2320910	8331	288.05	2399769	0	0	0	204.67	1705083	11711130	204.67	2396885536	658217	287.50	-0.07%	19.66%	10.96%	30.63%
11-04-2023	171700	293.23	50346876	95721	265.18	25383380	0	0	0	205.95	19713447	11787109	205.95	2427518966	873178	286.00	-0.52%	19.66%	10.96%	30.63%
12-04-2023	306191	288.00	86456494	320000	261.10	83552000	0	0	0	207.98	66555157	11767300	207.98	2447420303	890416	288.00	0.70%	33.71%	35.94%	69.65%
16-04-2023	6500	277.68	1804900	0	0.00	0	0	0	0	0.00	0	11773800	208.02	2449225203	699336	276.50	-2.19%	0.93%	0.00%	0.93%
24-04-2023	0	0.00	0	200000	296.60	59320624	0	0	0	208.02	41604668	11573800	208.02	2407620534	1563852	301.80	5.56%	0.00%	12.79%	12.79%
25-04-2023	46000	303.28	13950829	20000	306.83	6136558	0	0	0	208.40	4168009	11599800	208.40	2417403355	1183857	303.50	0.56%	3.89%	1.69%	5.57%
26-04-2023	71200	299.02	21290358	0	0.00	0	0	0	0	0.00	0	11671000	208.95	2438693712	1278029	299.10	-1.45%	5.57%	0.00%	5.57%
27-04-2023	3000	298.20	894600	0	0.00	0	0	0	0	0.00	0	11674000	208.98	2439588312	640958	287.50	-3.88%	0.47%	0.00%	0.47%
30-04-2023	6000	282.45	1694700	106500	282.69	30106400	0	0	0	209.01	22259986	11573500	209.01	2419023026	1270192	262.40	-8.73%	0.47%	8.38%	8.66%
07-05-2023	156672	229.09	35892505	0	0.00	0	0	0	0	0.00	0	11730172	209.28	2454915531	1490435	229.60	-8.38%	0.51%	0.00%	10.51%
08-05-2023	0	0.00	0	0	0.00	0	1000000	210.1	210100000	0.00	0	12730172	209.35	2665015531	1417238	210.10	-8.49%	0.00%	0.00%	0.00%
09-05-2023	0	0.00	0	186000	215.03	39996500	0	0	0	209.35	38938428	12544172	209.35	2626077103	1018791	228.40	8.71%	0.00%	18.26%	18.26%
10-05-2023	0	0.00	0	130000	220.00	28600000	0	0	0	209.35	27215030	12414172	209.35	2598862072	940458	229.90	0.66%	0.00%	13.82%	13.82%
14-05-2023	326000	215.76	70338600	0	0.00	0	0	0	0	0.00	0	12740172	209.51	2669200672	182893	192.90	-8.71%	17.83%	0.00%	17.83%
15-05-2023	138813	193.06	26799714	510000	185.32	94512920	0	0	0	209.33	106759981	12368985	209.33	2589240405	1770899	184.30				

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Total	11071064	250.39	2772104208	12464165	243.84	3039226190	0	13193224	163.99	2163620072	183.48	2286939895	12808563	210.90	2701370241
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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
707500	225.61	159618000.00	8031505	237.90	1910672433.10	11071064	250.39	2772104208.10	12464165	243.84	3039226190.30	183.48	2286939894.72	12808563	210.90	2701370240.61
Gain and Loss																

Gain and Loss by "UDC CONSTRUCTION LTD." from 01.07.2022 to 10.08.2023:

Realized Capital gain(loss)per unit	60.36	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	32.89%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	75,22,86,296.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (10-08-2023)	211.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	0.10	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	0.05%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	12,36,552.00	Quantity of Stock Position x Unrealized gain (loss) per unit

Contraventions:

Mr. MD. KALAM HOSSAIN with his associates i.e. UDC CONSTRUCTION LTD. AND VENUS BUILDERS LTD. manipulated the market price of shares of SEAPEARL by conducting active and aggressive trading jointly and made huge capital gain by deceiving general investors. Thus, UDC Construction Ltd. have violated the followings:

- **Section 17(e)(v) of Securities and Exchange Ordinance, 1969** by directly or indirectly effecting a series of transactions in the shares of 'SEAPEARL' creating the appearance of active trading therein and raising price of the said share.
- **Section 17(e)(ii) of Securities and Exchange Ordinance, 1969** by executing trades that created a false and misleading appearance of active trading in security.

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ১৫, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৩৫৩ স্মারকমূলে Md. Kalam Hossain and his Associates (associates are Mr. Md. Kalam Hossain, UDC Construction Ltd. and Venus Builders Ltd.)-কে মে ০৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে শুনানীতে UDC Construction Ltd.-এর পক্ষে Mr. Md. Shahjalal Dalim Khan (on behalf) উপস্থিত হয়ে মে ০৫, ২০২৪ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

“আমি মোঃ কালাম হোসেন, ব্যবস্থাপনা পরিচালক ইউডিসি কনস্ট্রাকশন লিঃ এবং ভেনাস বিল্ডার্স লিমিটেড এবং সীপার্ল বীচ রিসোর্ট এন্ড স্পা লিমিটেড এর একজন প্রেসমেন্ট শেয়ার-হোল্ডার। আমার বিনিয়োগকৃত প্রেসমেন্ট শেয়ারের পরিমাণ যথাক্রমে, ইউডিসি কনস্ট্রাকশন লিঃ-৫,১৪৫,০০০/-, ভেনাস বিল্ডার্স লিমিটেড-৪,৪১০,০০০/-, মোঃ কালাম হোসেন-১ ১৫৫,০০০।

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Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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আপনার প্রেরিত পত্র নম্বর BSEC/Enforcement/3426(2)/2024/353, তারিখ-এপ্রিল ১৫, ২০২৪ এর মাধ্যমে জানানতে পারি যে ২০২২-২৩ সালের সীপার্ল শেয়ার লেনদেন এর প্রেক্ষিতে আগামী ০৫ মে, ২০২৪ তারিখে কমিশনে শুনানীর জন্য আমাকে ডাকা হয়েছে। আপনার চিঠির অভিযোগের প্রেক্ষিতে আমার বক্তব্য নিম্নরূপ।

সীপার্ল বিশ্বের স্বনামধন্য হোটেল চেইন রয়েল টিউলিপ দ্বারা পরিচালিত এবং সেবা খাতে বাজারের অন্যতম শীর্ষ কোম্পানী। উল্লেখিত বিষয় পর্যবেক্ষন করে আমি সীপার্ল শেয়ারটির ফান্ডামেন্টাল এবং টেকনিক্যাল দিকগুলো বিশ্লেষণ করি। তাই ভবিষ্যৎ সম্ভাবনা এবং গ্রোথ বিবেচনা করে আমি ইউডিসি কনস্ট্রাকশন লিঃ-৫,১৪৫,০০০ শেয়ার বোনাস সহ, ডেনাস বিল্ডার্স লিমিটেড- ৪,৪১০,০০০ শেয়ার বোনাস সহ, মোঃ কালাম হোসেন-১ ১৫৫,০০০ শেয়ার বোনাস সহ প্লেসমেন্ট শেয়ার ক্রয় করে দীর্ঘ মেয়াদী বিনিয়োগ করি।

আপনাদের চিঠিতে বিভিন্ন তারিখ এবং সময়ের উল্লেখ করে যে, Series of transaction এবং Cross Trading এর অভিযোগ উত্থাপন করা হয়েছে যা সঠিক নয়। উল্লেখিত সময়ে আমার ব্রোকারেজ হাউজ এবং তাদের অথরাইজড রিপ্রেসেন্টেটিভ (ট্রেডার) আমাকে সঠিক ভাবে অবগত না করে আমার শেয়ার ক্রয়-বিক্রয় করেছে। উল্লেখিত সময়ের মধ্যে শেয়ার ক্রয় বিক্রয় বিষয়টি আমি সম্পূর্ণ অবহিত ছিলাম না, আপনাদের চিঠি পাওয়ার বিষয়টি সম্পর্কে আমি অবহিত হয়েছি। তাই আমার বিরুদ্ধে আনীত আপনাদের চিঠিতে যে Series of transaction এবং Cross Trading কথা উল্লেখ করা হয়েছে তা অমূলক।

আপনাদের চিঠিতে আমার বিরুদ্ধে যে Manipulative transaction এর অভিযোগ আনা হয়েছে তা সম্পূর্ণ ভুল এবং ভিত্তিহীন। সীপার্ল বাচ রিসোর্ট এন্ড স্পা লিমিটেড এর একজন প্লেসমেন্ট শেয়ার-হোল্ডার হিসাবে আমি এবং আমার কোম্পানীদ্বয় লিংক একাউন্টের মাধ্যমে শেয়ার ট্রান্সফার করেছি মাত্র, যেহেতু আমার এবং আমার কোম্পানীদ্বয় উক্ত প্লেসমেন্ট শেয়ার বিষয়ে প্রোসপেক্টাসে উল্লেখ রয়েছে এবং বিষয়টি আগে থেকেই বিএসইসি অবগত তাই এখানে Manipulative transaction এর কোন অবকাশ নেই।

আপনাদের চিঠিতে রিয়েলাইজড এবং আন-রিয়েলাইজড প্রফিট এর কথা উল্লেখ করেছেন, এ বিষয়ে আমার বক্তব্য হল: আমি সীপার্ল বাচ রিসোর্ট এন্ড স্পা লিমিটেড এর একজন প্লেসমেন্ট শেয়ার-হোল্ডার এবং যেহেতু আমার এবং আমার কোম্পানীদ্বয়ের উক্ত প্লেসমেন্ট শেয়ার বিষয়ে প্রোসপেক্টাসে উল্লেখ রয়েছে এবং বিষয়টি আগে থেকেই বিএসইসি অবগত তাই এখানে ব্যাপক মুনাফা করার কোন অবকাশ নাই। প্রকৃত পক্ষে বাজারের সার্বিক অবস্থা বিবেচনা করে এবং সীপার্ল বাচ রিসোর্ট এন্ড স্পা লিমিটেড শেয়ারের বাজার মূল্য যেন ক্ষতিগ্রস্ত না হয় সেটি বিবেচনায় নিয়ে আমি ব্যক্তিগত ভাবে পারস্পরিক সমঝোতার মাধ্যমে আমার প্লেসমেন্ট শেয়ার ব্লক মার্কেটে বিক্রয় করেছি, সেজন্য আমার পোর্ট ফলিওতে একশত একাত্তর কোটি টাকা রিয়েলাইজড প্রফিট দেখানো হয়েছে। তাই আপনাদের চিঠিতে উল্লেখিত ব্যাপক মুনাফা এর বিষয়টি সত্য নয়।

উক্ত সময়ে আমার বিও হিসাবের সম্পূর্ণতার মাধ্যমে সীপার্ল এর শেয়ার লেনদেনে যে,

- Cross Trading
- Series of Transaction
- Manipulative Transaction

প্রফিট এর যে অভিযোগ আনা হয়েছে তা সম্পূর্ণ ভিত্তিহীন। আমার বিও হিসাব হতে উক্ত সময়ে সিকিউরিটিজ আইনের কোন ধারার লংঘন হয় নাই।

পরিশেষে আমি বলতে চাই যে, আমার উপরোক্ত বক্তব্য আমলে নিয়ে আমার বিরুদ্ধে আনীত সিকিউরিটিজ এন্ড এক্সচেঞ্জ অর্ডিন্যান্স ১৯৬৯ এর ধারা 17(e)(ii), 17(e)(iii) এবং 17(e)(v) আইন লংঘনের অভিযোগ হতে আমাকে অব্যাহতি প্রদান করা হউক।”

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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যেহেতু, UDC Construction Ltd.-এর উল্লিখিত বক্তব্য এবং অনুসন্ধান প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে UDC Construction Ltd.-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, UDC Construction Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ও Section 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

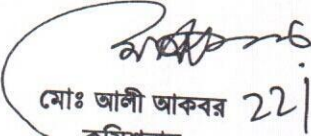
যেহেতু, UDC Construction Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য UDC Construction Ltd.-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-

- UDC Construction Ltd.-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা এবং Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ৬৮.০০ (আটষাট) কোটি টাকা [মোট ৬৮.০১ (আটষাট দশমিক শূন্য এক) কোটি 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 ২২/০৮/১০২৫
কমিশনার

বিতরণ:

১। UDC Construction Ltd.

(BOID: 1203110068826218, 1203260068826218,
1205660068826218, 1201950064794179, 1202550064794179,
1204780064794179, 1206470064794179, 1602170064794179
and 1605170064794179)

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