Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৫
তারিখঃ আগস্ট ০৪, ২০২৬

Ambia Enterprise
(BOID: 1203510076533574)
51, Nayapalton (5th Floor), Nayapalton, Dhaka
Mobile:01705100090.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

04.08.2026

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 একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৬
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Md. Shafiqur Rahman
(BOID: 1203510016561598, 1203510076873590)
The Bappi Associate, 2/C, Purana Palton (1st Floor), Dhaka.
Mobile:01824892514.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের 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 একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৭
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Mohammad Shamsul Alam
(BOID: 1203510068173076)
51, Nayapalton (5th Floor), Nayapalton, Dhaka
Mobile:01705100090.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

04.08.2026

মোঃ সুলতান সালাহ উদ্দিন
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অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৮
তারিখঃ আগস্ট ০৪, ২০২৬

Arbim Techo Ltd.
(BOID: 1205670068895861)
House # 51, Nayapalton (4th Floor), Nayapalton, Dhaka.
Mobile: 01726408585.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

04.08.2023

মোঃ সুলতান সালাহ উদ্দিন
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অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৯
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Bikash Chandra Sarker
(BOID: 1204120065465983,
1605550058872405 and 1203510076873590)
31/1, Chamelibag, Shantinagar, Paltan, Dhaka.
Mobile: 01716846230.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

০৪.০৮.২০২৪

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 একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪০
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Mohammad Shah Alam Minto
(BOID: 1203510076679582)
House: 51 (4th Floor), Naya Palton, GPO, Dhaka.
Mobile:016737772222.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

08.08.2025

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 একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪১
তারিখঃ আগস্ট ০৪, ২০২৬

Ms. Sultana Parvin
(BOID: 1203510068907832)
178E, 914 South Banasri, Khilgaon, Dhaka
Mobile:01552382214.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

০৪.০৮.2024
মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
IP PABX: 88-02-09609-100600, Ext- 1220
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অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪২
তারিখঃ আগস্ট ০৪, ২০২৬

Ms. Amina Begum
(BOID: 1203510069527644)
207/B, Malibagh, Chowdhury para, Khilgaon, Dhaka-1219.
Mobile: 01552337344.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

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০৪.০৮.২০২৪

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
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অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪৩
তারিখঃ আগস্ট ০৪, ২০২৬

Ms. Dipika Saha
(BOID: 1203510068348700)
17/3, Farniture Patti, Norshingdi
Wast Kandapara, Narshingdi.
Mobile:01914826889.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

08.08.2026

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 একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪৪
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Md. Mamun
(BOID: 1203510074090491)
House# F-4/1, T&T Colony, Moghbazar
P.O-Shantinagar, P.S-Ramna, Dhaka
Mobile: 01838693000.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

04.08.2026

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
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অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪৫
তারিখঃ আগস্ট ০৪, ২০২৬

Mr. Mohammad Abdul Latif
(BOID: 1203510074578548)
216,1, Fakirerpool, P.O-Arambagh, Dhaka
Mobile: 01712288790.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

০৪.০৮.২০২৬

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
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১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৪৬
তারিখঃ আগস্ট ০৪, ২০২৬

Ms. Farhana Akter
(BOID: 1203510075185407)
Flat-4A, Plot-514, Block-1, Road-16/A,
Basundhara R/A, Khilkhet, Vatara, Dhaka.
Mobile:01912156602.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

Salahuddin
08.08.2026

মোঃ সুলতান সালাহ উদ্দিন
উপপরিচালক (এনফোর্সমেন্ট)
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ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের একান্ত সচিব, 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।

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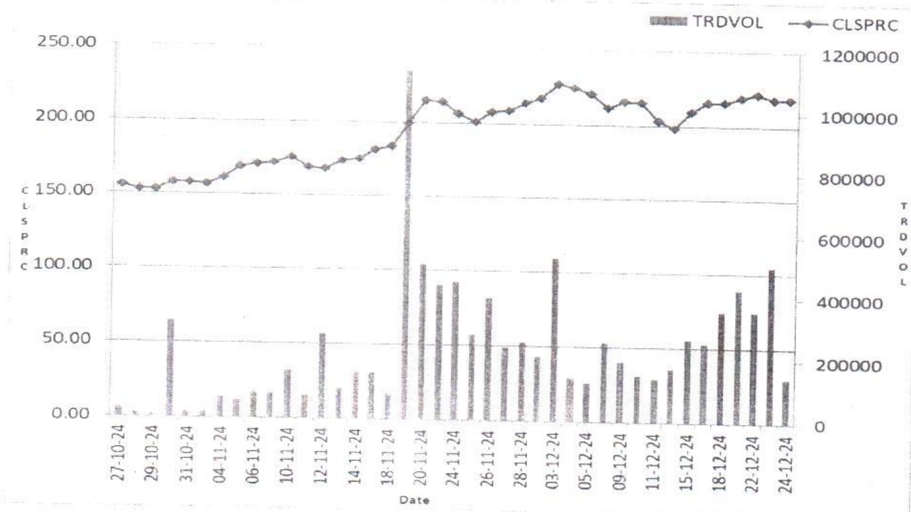
নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৫৩৪ তারিখঃ আগস্ট ০৪, ২০২৬

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, ডিসেম্বর ২৪, ২০২৪ তারিখের কমিশনের তদন্ত (investigation) আদেশ নং BSEC/Surveillance/2023-0097/403 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড-এর একটি তদন্ত দল ২৮.১০.২০২৪ থেকে ২৪.১২.২০২৪ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS) এর শেয়ার লেনদেন সংক্রান্ত তদন্ত কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

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



Yesterday Closing Price (YCP) of the share of FINEFOODS as on 28-10-2024 was Tk. 155.80 and closing price of the same was Tk. 218.60 as on 24-12-2024. During this period from 28-10-2024 to 24-12-2024, price of the share of FINEFOODS was increased by Tk. 62.80 which is approximately 40.31% higher compared to closing price of 27-10-2024.

Observations and findings:

A. TRADE DETAILS OF AMBIA ENTERPRISE AND ASSOCIATES:

Observation- 1:

After analyzing documents, it is observed that AMBIA ENTERPRISE (Client code # 22341 of Stock & Bond Limited) was the top 19th buyer of FINEFOODS share from 28-10-2024 to 24-12-2024. It was observed that the aforesaid client was involved with the following accounts through which they traded shares of "FINEFOODS" during the investigation period.

BO ID	Client Code	Client Name	Name of TREC Holder	EMAIL	Remarks
1203510076533574	22341	AMBIA ENTERPRISE	Stock & Bond Limited	shamsulalamlee@gmail.com	MOHAMMAD SHAMSUL ALAM is the owner of AMBIA ENTERPRISE and Owner's Email Address found in BO details
1203510016561598	22248	MD. SHAFIQUR RAHMAN	Stock & Bond Limited	shamsulalamlee@gmail.com	Same Email used for MOHAMMAD SHAMSUL ALAM
1203510068173076	22232	MOHAMMAD SHAMSUL ALAM	Stock & Bond Limited	shamsulalamlee@gmail.com	Owner of AMBIA ENTERPRISE
1205670068895861	10550	ARBIM TECHO LTD	BD Sunlife Securities Ltd	shamsulalamlee@gmail.com	Owner is MOHAMMAD SHAH ALAM MINTO and also brother of MOHAMMAD SHAMSUL ALAM. MOHAMMAD SHAMSUL ALAM is also a director of the company.
1203510076873590	22342	MD SHAFIQUR RAHMAN and Bikash Chandra Sarker	Stock & Bond Limited	mejbah.sjs@gmail.com	Joint account
1203510076679582	22339	MOHAMMAD SHAH ALAM MINTO	Stock & Bond Limited	msam777@hotmail.com	Brother of MOHAMMAD SHAMSUL ALAM
1203510068907832	22246	SULTANA PARVIN	Stock & Bond Limited	shamsulalamlee@gmail.com	Sister of MOHAMMAD SHAMSUL ALAM and Same Email.
1203510069527644	22254	AMINA BEGUM	Stock & Bond Limited	shamsulalamlee@gmail.com	In CDBL trade database, found same Email of MOHAMMAD SHAMSUL ALAM
1203510068348700	22240	DIPIKA SAHA	Stock & Bond Limited	shamsulalamlee@gmail.com	In CDBL trade database, found same Email of MOHAMMAD SHAMSUL ALAM
1203510074090491	22296	MD. MAMUN	Stock & Bond Limited	shamsulalamlee@gmail.com	In CDBL trade database, found same Email of MOHAMMAD SHAMSUL ALAM
1203510074578548	22302	MOHAMMAD ABDUL LATIF	Stock & Bond Limited	shamsulalamlee@gmail.com	In CDBL trade database, found same Email of MOHAMMAD SHAMSUL ALAM
1203510075185407	22306	FARHANA AKTER	Stock & Bond Limited	shamsulalamlee@gmail.com	In CDBL trade database, found same Email of MOHAMMAD SHAMSUL ALAM
1204120065465983	33167	BIKASH CHANDRA SARKER	Mah Securities Limited	bikashsarker96@gmail.com	Single Account
1605550058872405	U0221	BIKASH CHANDRA SARKER	Alpha Capital Management Limited	bikashsarker96@yahoo.com	Single Account

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Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by the said client and gain and loss statement of AMBIA ENTERPRISE and Associates are given below (as per DSE trade data):

I. Individual Trade Patterns of AMBIA ENTERPRISE and Associates (Only Public Market):

Date	Code # 22341				Code # 22248				Code # 22232				Code # 10550				Code # 22342			
	BO ID # 1203510076533574				BO ID # 1203510016561598				BO ID # 1203510068173076				BO ID # 1205670068895861				BO ID # 1203510076873590			
	AMBIA ENTERPRISE				MD. SHAFIQUR RAHMAN				MOHAMMAD SHAMSUL ALAM				ARBIM TECHO LTD				MD SHAFIQUR RAHMAN			
	Stock & Bond Limited				Stock & Bond Limited				Stock & Bond Limited				BD Sunlife Securities Ltd				Stock & Bond 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
28-Oct-24	0	0.00	0	0.00	0	0.00	0	0.00	5	152.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-Oct-24	0	0.00	0	0.00	0	0.00	0	0.00	990	152.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-Oct-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1	158.60	0	0.00	0	0.00	4000	156.18	0	0.00
31-Oct-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	4000	158.16	0	0.00
3-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	210	158.79	1210	157.12	0	0.00	0	0.00	0	0.00	0	0.00
4-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	649	159.80	649	161.60	0	0.00	0	0.00	200	159.64	0	0.00
5-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	1050	163.67	52	166.00	0	0.00	0	0.00	0	0.00	0	0.00
6-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1050	171.90	0	0.00	0	0.00	0	0.00	0	0.00
10-Nov-24	0	0.00	0	0.00	0	0.00	3350	173.43	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-Nov-24	0	0.00	11244	170.95	0	0.00	2400	171.78	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-Nov-24	0	0.00	32209	168.00	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-Nov-24	13000	173.81	5	170.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	24950	212.44	0	0.00	0	0.00	0	0.00	0	0.00
21-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	15942	215.89	0	0.00	0	0.00	0	0.00	0	0.00
24-Nov-24	0	0.00	72727	205.87	0	0.00	0	0.00	0	0.00	22548	206.29	0	0.00	0	0.00	0	0.00	0	0.00
25-Nov-24	0	0.00	3077	199.31	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-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	26560	208.88	0	0.00	0	0.00	0	0.00	0	0.00
27-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	5000	209.00	10000	206.34	0	0.00	0	0.00	0	0.00	8200	210.04
28-Nov-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000	213.92	0	0.00	0	0.00	0	0.00	0	0.00
2-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	5000	216.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
3-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	227.58	0	0.00	0	0.00	0	0.00
4-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4704	223.76	0	0.00	0	0.00	0	0.00	0	0.00
8-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	58	210.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9-Dec-24	20000	212.04	0	0.00	0	0.00	0	0.00	15319	214.82	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-Dec-24	8000	215.31	0	0.00	0	0.00	0	0.00	1496	215.05	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	7556	202.98	0	0.00	14654	204.45	0	0.00	0	0.00	0	0.00
12-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	275	196.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-Dec-24	42000	209.51	0	0.00	0	0.00	0	0.00	5000	210.00	0	0.00	0	0.00	0	0.00	7500	209.97	0	0.00
17-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	10000	214.84	0	0.00	0	0.00	0	0.00	2700	213.00	0	0.00
Total	83000		119262		0		5750		52608		112666		34654		0		18400		8200	

Date	Code # 22339				Code # 22246				Code # 22254				Code # 22240				Code # 22296			
	BO ID # 1203510076679582				BO ID # 1203510068907832				BO ID # 1203510069527644				BO ID # 1203510068348700				BO ID # 1203510074090491			
	MOHAMMAD SHAH ALAM MINTO				SULTANA PARVIN				AMINA BEGUM				DIPIKA SAHA				MD. MAMUN			
	Stock & Bond Limited				Stock & Bond Limited				Stock & Bond Limited				Stock & Bond Limited				Stock & Bond 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
4-Nov-24	649	161.18	649	160.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
5-Nov-24	2000	164.89	2000	163.75	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-Nov-24	0	0.00	25555	212.39	0	0.00	4970	211.40	0	0.00	2500	211.38	0	0.00	0	0.00	0	0.00	0	0.00
21-Nov-24	0	0.00	24145	211.92	0	0.00	3975	212.20	0	0.00	2000	212.20	0	0.00	0	0.00	0	0.00	100	206.30
24-Nov-24	10000	208.27	0	0.00	0	0.00	0	0.00	2000	208.89	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-Nov-24	0	0.00	1000	208.36	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-Nov-24	0	0.00	9000	213.16	0	0.00	0	0.00	0	0.00	2000	214.50	0	0.00	0	0.00	0	0.00	0	0.00
8-Dec-24	6559	216.42	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9-Dec-24	0	0.00	0	0.00	5000	216.54	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-Dec-24	0	0.00	0	0.00	0	0.00	0	0.00	300	216.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

11-Dec-24	3441	203.10	0	0.00	2000	202.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
12-Dec-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	0	0.00
15-Dec-24	1000	204.96	0	0.00	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	23649		62349		7000		8945		2300		6500		0		0		0		100	

Date	Code # 22302				Code # 22306				Code # 33167				Code # U0221				Total					
	BO ID # 1203510074578548				BO ID # 1203510075185407				BO ID # 1204120065465983				BO ID # 1605550058872405									
	MOHAMMAD ABDUL LATIF				FARHANA AKTER				BIKASH CHANDRA SARKER				BIKASH CHANDRA SARKER									
	Stock & Bond Limited				Stock & Bond Limited				Mah Securities Limited				Alpha Capital Management 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	Buy Rate	Total	Sale Qty.	Sale Rate	Total
28-Oct-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	5	152.50	762.50	0	0.00	0.00
29-Oct-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	990	152.60	151074.00	0	0.00	0.00
30-Oct-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	4000	156.18	624700.00	1	158.60	158.60
31-Oct-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	4000	158.16	632645.00	0	0.00	0.00
3-Nov-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	210	158.79	33345.00	1210	157.12	190121.00
4-Nov-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	1498	160.38	240242.60	1298	161.15	209172.70
5-Nov-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	3050	164.47	501633.60	2052	163.81	336132.00
6-Nov-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	0.00	1050	171.90	180495.00
10-Nov-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	0.00	3350	173.43	580984.00
11-Nov-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	0.00	13644	171.09	2334399.80
12-Nov-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	0.00	32209	168.00	5411117.80
13-Nov-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	13000	173.81	2259535.40	5	170.10	850.50
20-Nov-24	0	0.00	0	0.00	0	0.00	200	207.70	0	0.00	5000	213.12	0	0.00	5300	205.20	0	0.00	0.00	68575	211.77	14522437.20
21-Nov-24	0	0.00	0	0.00	0	0.00	1000	208.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	47062	213.23	10035187.20
24-Nov-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	12000	208.37	2500457.80	95275	205.97	19623736.50
25-Nov-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	0.00	3077	199.31	613275.90
26-Nov-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	0.00	34760	209.15	7270123.90
27-Nov-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	5000	209.00	1045000.00	11000	206.52	2271745.90
28-Nov-24	0	0.00	2000	211.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	18000	213.33	3840004.10
2-Dec-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	5000	216.00	1080000.00	0	0.00	0.00
3-Dec-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	20000	227.58	4551520.00	0	0.00	0.00
4-Dec-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	0.00	4704	223.76	1052586.00
8-Dec-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	6617	216.37	1431712.00	0	0.00	0.00
9-Dec-24	0	0.00	0	0.00	1000	216.25	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	41319	213.72	8830575.90	0	0.00	0.00
10-Dec-24	1000	212.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10796	214.99	2321016.00	0	0.00	0.00
11-Dec-24	990	209.26	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	28641	203.93	5840768.80	0	0.00	0.00
12-Dec-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	275	196.00	53900.00	0	0.00	0.00
15-Dec-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	55500	209.53	11629149.50	0	0.00	0.00
17-Dec-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	12700	214.45	2723476.00	0	0.00	0.00
Total	1990		2000		1000		1200		0		5000		0		5300		224601			337272		

Bangladesh Securities and Exchange Commission

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

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by AMBIA ENTERPRISE and Associates:

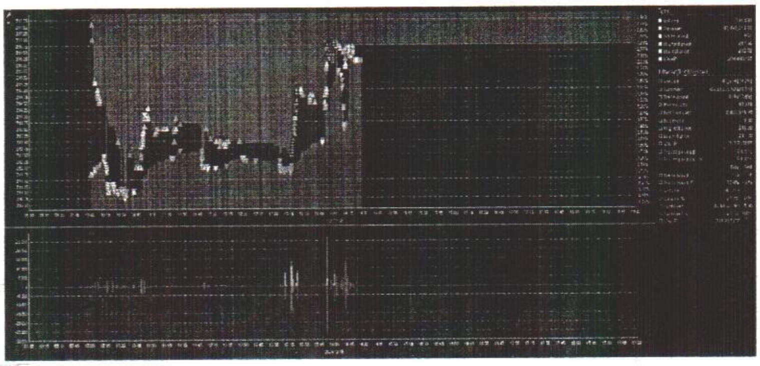
Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									1045973	160.76	168153892.48						
28-10-24	5	152.50	762.50	0	0.00	0.00	0.00	0.00	1045978	160.76	168154654.98	14758	152.70	-1.99%	0.03%	0.00%	0.03%
29-10-24	990	152.60	151074.00	0	0.00	0.00	0.00	0.00	1046968	160.76	168305728.98	39295	152.80	0.07%	2.52%	0.00%	2.52%
30-10-24	4000	156.18	624700.00	1	158.60	158.60	160.74	160.74	1050967	160.74	168930268.24	309998	157.50	3.08%	1.29%	0.00%	1.29%
31-10-24	4000	158.16	632645.00	0	0.00	0.00	0.00	0.00	1054967	160.73	169562913.24	19809	157.50	0.00%	20.19%	0.00%	20.19%
03-11-24	210	158.79	33345.00	1210	157.12	190121.00	160.73	194480.62	1053967	160.73	169401777.63	19330	156.50	-0.63%	1.09%	6.26%	7.35%
04-11-24	1498	160.38	240242.60	1298	161.15	209172.70	160.73	208624.01	1054167	160.73	169433396.22	305349	161.10	2.94%	0.49%	0.43%	0.92%
05-11-24	3050	164.47	501633.60	2052	163.81	336132.00	160.74	329834.54	1055165	160.74	169605195.28	58063	168.70	4.72%	5.25%	3.53%	8.79%
06-11-24	0	0.00	0.00	1050	171.90	180495.00	160.74	168774.98	1054115	160.74	169436420.29	79358	171.00	1.36%	0.00%	1.32%	1.32%
10-11-24	0	0.00	0.00	3350	173.43	580984.00	160.74	538472.57	1050765	160.74	168897947.73	152373	175.80	2.33%	0.00%	2.20%	2.20%
11-11-24	0	0.00	0.00	13644	171.09	2334399.80	160.74	2193110.35	1037121	160.74	166704837.38	72504	168.80	-3.98%	0.00%	18.82%	18.82%
12-11-24	0	0.00	0.00	32209	168.00	5411117.80	160.74	5177212.79	1004912	160.74	161527624.59	774406	168.00	-0.47%	0.00%	4.16%	4.16%
13-11-24	13000	173.81	2259535.40	5	170.10	850.50	160.91	804.53	1017907	160.91	163786355.46	117524	173.80	3.45%	11.06%	0.00%	11.07%
19-11-24	0	0.00	0.00	50000	178.00	8900000.00	160.91	8045251.46	967907	160.91	155741104.01	1598208	199.30	8.32%	0.00%	3.13%	3.13%
20-11-24	0	0.00	0.00	68575	211.77	14522437.20	160.91	11034062.37	899332	160.91	144707041.63	591917	214.90	7.83%	0.00%	11.59%	11.59%
21-11-24	0	0.00	0.00	47062	213.23	10035187.20	160.91	7572512.48	852270	160.91	137134529.15	491225	214.20	-0.33%	0.00%	9.58%	9.58%
24-11-24	12000	208.37	2500457.80	95275	205.97	19623736.50	161.56	15393017.67	768995	161.56	124241969.28	444570	206.20	-3.73%	2.70%	21.43%	24.13%
25-11-24	20000	190.25	3805000.00	23077	191.46	4418275.90	162.29	3745194.72	765918	162.29	124301774.56	358312	201.10	-2.47%	5.58%	6.44%	12.02%
26-11-24	0	0.00	0.00	34760	209.15	7270123.90	162.29	5641243.17	731158	162.29	118660531.39	560254	207.70	3.28%	0.00%	6.20%	6.20%
27-11-24	5000	209.00	1045000.00	11000	206.52	2271745.90	162.61	1788693.25	725158	162.61	117916838.15	322214	209.00	0.63%	1.55%	3.41%	4.97%
28-11-24	0	0.00	0.00	18000	213.33	3840004.10	162.61	2926952.59	707158	162.61	114989885.55	359872	214.00	2.39%	0.00%	5.00%	5.00%
02-12-24	5000	216.00	1080000.00	0	0.00	0.00	0.00	0.00	712158	162.98	116069885.55	295443	217.50	1.64%	1.69%	0.00%	1.69%
03-12-24	20000	227.58	4551520.00	0	0.00	0.00	0.00	0.00	732158	164.75	120621405.55	602105	227.20	4.46%	3.32%	0.00%	3.32%
04-12-24	0	0.00	0.00	4704	223.76	1052586.00	164.75	774973.56	727454	164.75	119846431.99	203491	224.80	-1.06%	0.00%	2.31%	2.31%
08-12-24	6617	216.37	1431712.00	0	0.00	0.00	0.00	0.00	734071	165.21	121278143.99	262319	211.70	-4.25%	2.52%	0.00%	2.52%
09-12-24	41319	213.72	8830575.90	0	0.00	0.00	0.00	0.00	775390	167.80	130108719.89	200481	216.10	2.08%	20.61%	0.00%	20.61%
10-12-24	10796	214.99	2321016.00	0	0.00	0.00	0.00	0.00	786186	168.45	132429735.89	175732	215.80	-0.14%	6.14%	0.00%	6.14%
11-12-24	28641	203.93	5840768.80	0	0.00	0.00	0.00	0.00	814827	169.69	138270504.69	143784	203.50	-5.70%	19.92%	0.00%	19.92%
12-12-24	275	196.00	53900.00	0	0.00	0.00	0.00	0.00	815102	169.70	138324404.69	349373	198.40	-2.51%	0.08%	0.00%	0.08%
15-12-24	55500	209.53	11629149.50	0	0.00	0.00	0.00	0.00	870602	172.24	149953554.19	296257	209.90	5.80%	18.73%	0.00%	18.73%
17-12-24	12700	214.45	2723476.00	0	0.00	0.00	0.00	0.00	883302	172.85	152677030.19	330314	216.30	3.05%	3.84%	0.00%	3.84%
Total	244601	205.46	50256514.10	407272	199.32	81177528.10	161.40	65733376.39	883302	172.85	152677030.19						

I. **Trade monitoring screenshots of AMBIA ENTERPRISE and Associates (public market):**

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of AMBIA ENTERPRISE and associates were observed which influenced the price of FINEFOODS.

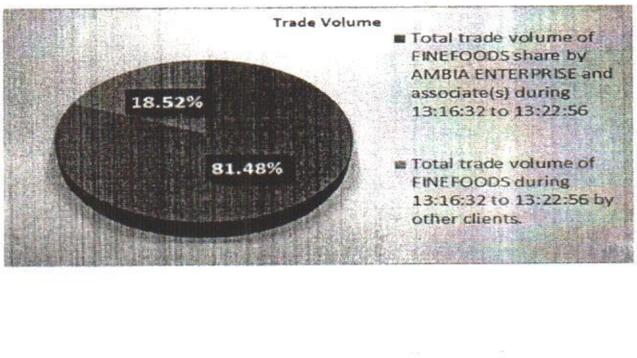
BOIDs: 1203510076533574, 1203510016561598, 1203510068173076, 1205670068895861, 1203510076873590, 1203510076679582, 1203510068907832, 1203510069527644, 1203510068348700, 1203510074090491, 1203510074578548, 1203510075185407, 1204120065465983, 1605550058872405 (Combined)

09-12-2024

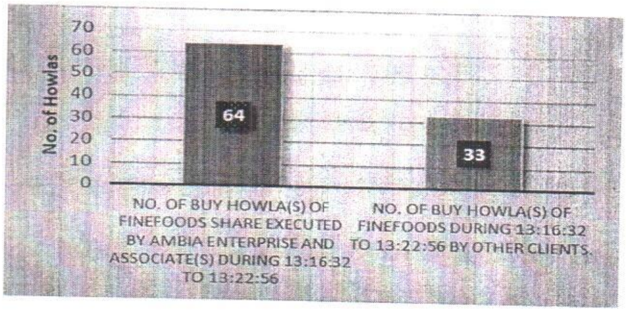


It was observed in the above graph that on 09-12-2024, total number of trades of FINEFOODS in the market was 961, whereas number of trades (buy) executed by AMBIA ENTERPRISE and associate(s) were 119 which is approximately 12.38% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 195,349 whereas buy volume by the said client(s) was 41,319 which is approximately 21.15% of the total traded volume in the market.

On 09-12-2024, trading of FINEFOODS share was started at Tk. 211.70 which is similar as the YCP of Tk. 211.70. On that day, AMBIA ENTERPRISE and associate(s) started series of trading at 13:16:32 at price Tk. 211.80 and induced the same to rise to Tk. 215.00 up to 13:22:56. It can also be observed from the above graph that AMBIA ENTERPRISE and associate(s) executed significant trades during this time period. It is mentionable here that from 13:16:32 to 13:22:56, AMBIA ENTERPRISE and associate(s) bought 22,679 shares of FINEFOODS compared to the total traded share of 27,834. This is shown in the following Pie Chart.

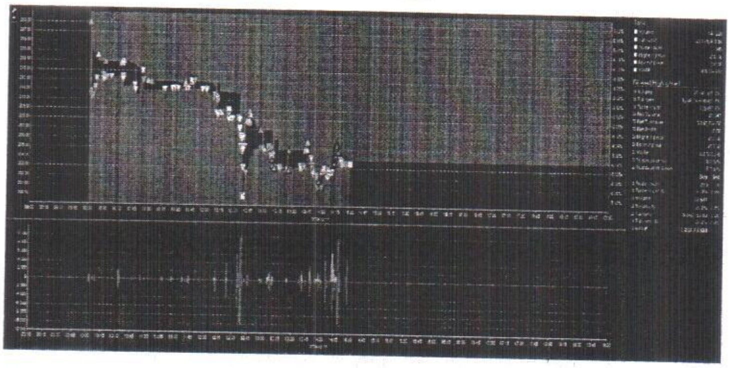


It is also found that during the aforementioned period, AMBIA ENTERPRISE and associate(s) executed 64 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 97 as shown in the following Bar Chart.



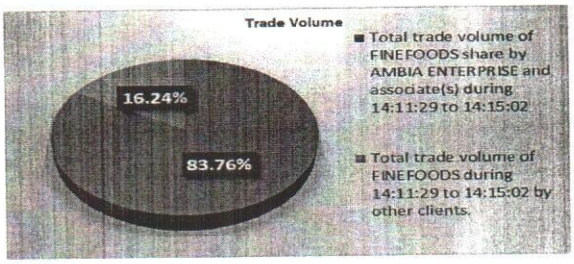
It is observed from the above graphs and screenshot that AMBIA ENTERPRISE and associate(s) bought 81.48% of the total trades of FINEFOODS shares by executing 64 of total 97 howlas from 13:16:32 to 13:22:56 on 09-12-2024. From 13:16:32 to 13:22:56, AMBIA ENTERPRISE and associate(s) induced the price to rise from Tk. 211.80 to Tk. 215.00 (induced the price by Tk. 3.20). Thus it seems that AMBIA ENTERPRISE and associate(s) were actively trying to lift the price of FINEFOODS share.

<u>11-12-24</u>

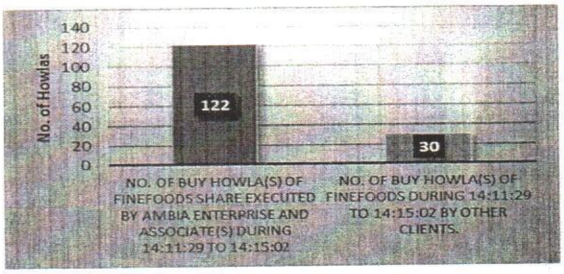


It was observed in the above graph that on 11-12-2024, total number of trades of FINEFOODS in the market was 949, whereas number of trades (buy) executed by AMBIA ENTERPRISE and associate(s) were 220 which is approximately 23.18% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 141,220 whereas buy volume by the said client(s) was 28,641 which is approximately 20.28% of the total traded volume in the market.

On 11-12-2024, trading of FINEFOODS share was started at Tk. 218.00 which is Tk. 2.20 more than the YCP of Tk. 215.80. On that day, AMBIA ENTERPRISE and associate(s) started series of trading at 14:11:29 at price Tk. 203.40 and induced the same to rise to Tk. 205.70 up to 14:15:02. It can also be observed from the above graph that AMBIA ENTERPRISE and associate(s) executed significant trades during this time period. It is mentionable here that from 14:11:29 to 14:15:02, AMBIA ENTERPRISE and associate(s) bought 14,154 shares of FINEFOODS compared to the total traded share of 16,899. This is shown in the following Pie Chart.

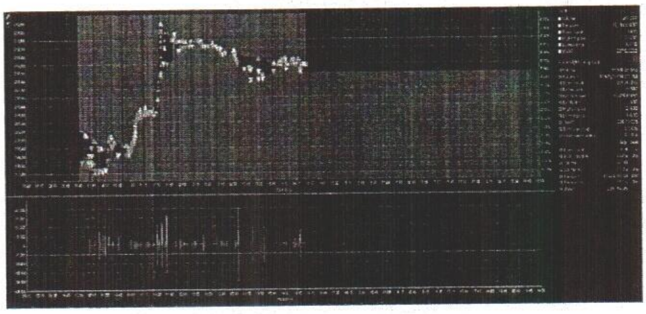


It is also found that during the aforementioned period, AMBIA ENTERPRISE and associate(s) executed 122 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 152 as shown in the following Bar Chart.



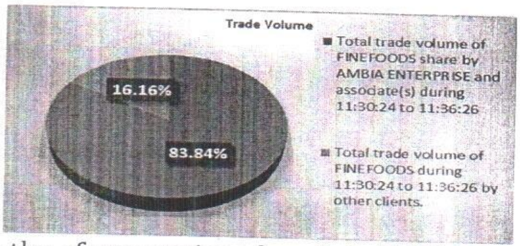
It is observed from the above graphs and screenshot that AMBIA ENTERPRISE and associate(s) bought 83.76% of the total trades of FINEFOODS shares by executing 122 of total 152 howlas from 14:11:29 to 14:15:02 on 11-12-2024. From 14:11:29 to 14:15:02, AMBIA ENTERPRISE and associate(s) induced the price to rise from Tk. 203.40 to Tk. 205.70 (induced the price by Tk. 2.30). Thus it seems that AMBIA ENTERPRISE and associate(s) were actively trying to lift the price of FINEFOODS share.

<u>15-12-24</u>

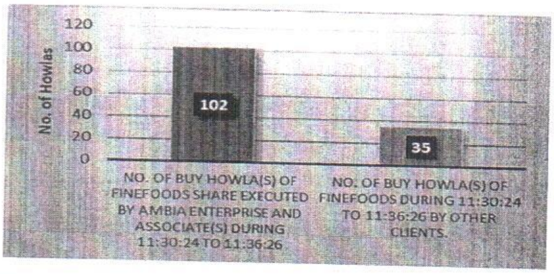


It was observed in the above graph that on 15-12-2024, total number of trades of FINEFOODS in the market was 1840, whereas number of trades (buy) executed by AMBIA ENTERPRISE and associate(s) were 279 which is approximately 15.16% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 266,337 whereas buy volume by the said client(s) was 55,500 which is approximately 20.84% of the total traded volume in the market.

On 15-12-2024, trading of FINEFOODS share was started at Tk. 198.20 which is Tk. 0.20 less than the YCP of Tk. 198.40. On that day, AMBIA ENTERPRISE and associate(s) started series of trading at 11:30:24 at price Tk. 204.80 and induced the same to rise to Tk. 214.00 up to 11:36:26. It can also be observed from the above graph that AMBIA ENTERPRISE and associate(s) executed significant trades during this time period. It is mentionable here that from 11:30:24 to 11:36:26, AMBIA ENTERPRISE and associate(s) bought 19,281 shares of FINEFOODS compared to the total traded share of 22,997. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, AMBIA ENTERPRISE and associate(s) executed 102 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 137 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that AMBIA ENTERPRISE and associate(s) bought 83.84% of the total trades of FINEFOODS shares by executing 102 of total 137 howlas from 11:30:24 to 11:36:26 on 15-12-2024. From 11:30:24 to 11:36:26, AMBIA ENTERPRISE and associate(s) induced the price to rise from Tk. 204.80 to Tk. 214.00 (induced the price by Tk. 9.20). Thus it seems that AMBIA ENTERPRISE and associate(s) were actively trying to lift the price of FINEFOODS share.

II. Summary of the trade by AMBIA ENTERPRISE and associate(s):

Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
20000	190.25	3805000.00	70000	181.50	12705000.00	244601	205.46	50256514.10	407272	199.32	81177528.10	161.40	65733376.39	883302	172.85	152677030.19

III. Gain and Loss by AMBIA ENTERPRISE and associate(s) from 28.10.2024 to 24.12.2024:

Realized Capital gain(loss)per unit	37.92	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	23.50%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	1,54,44,151.71	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	45.75	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	26.47%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	4,04,12,787.01	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that AMBIA ENTERPRISE and associate(s) bought 244601 shares and sold 407272 shares of FINEFOODS from public and block market during the period from 28-10-2024 to 24-12-2024. With the said BO account(s), AMBIA ENTERPRISE and associate(s) traded 4.85% shares of FINEFOODS and realized a capital gain of Tk. 15444151.71 from the trading of FINEFOODS share during the investigation period. The said client(s) had also unrealized gain of TK. 40412787.01 during the period.

Finding-1:

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

> ....
>
> *(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-*
>
> ....
>
> *(v) directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"*

It is evident that AMBIA ENTERPRISE and associate(s) were involved directly and indirectly in a series of transactions of **FINEFOODS** share with his aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

Contravention-1:

AMBIA ENTERPRISE (BO ID # 1203510076533574) and his associates have violated the followings:

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

Observation-2:

After analyzing the trade pattern of the clients, the investigation team found that AMBIA ENTERPRISE (BOID# 1203510076533574) and associates were involved in trading of shares of "FINEFOODS" within the investigation period and these accounts are acting as counter party of each other for 25400 shares of "FINEFOODS" on 05-11-2024, 24-11-2024 & 25-11-2024 in 21 howlas in the Public & block market.

Details of the above mentioned trades are as follows:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOID SELLER	MARKET TYPE	BUYER	SELLER
05-11-24	11:00:06	341774058	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076 Mohammad Shamsul Alam	1203510076679582 Mohammad Shah Alam Minto
05-11-24	11:00:06	341774059	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public		
05-11-24	11:00:06	341774060	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774061	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774062	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774063	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774064	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774065	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774066	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
05-11-24	11:00:06	341774067	FINEFOODS	100	163.5	DSESBL	22232	1203510068173076	DSESBL	22339	1203510076679582	Public	1203510068173076	1203510076679582
24-11-24	13:25:48	344043380	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582 Mohammad Shah Alam Minto	1203510076533574 Ambia Enterprise
24-11-24	13:25:48	344043381	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public		
24-11-24	13:25:48	344043382	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043383	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043384	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043385	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043386	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043387	FINEFOODS	500	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
24-11-24	13:25:48	344043388	FINEFOODS	400	205.4	DSESBL	22339	1203510076679582	DSESBL	22341	1203510076533574	Public	1203510076679582	1203510076533574
25-11-24	13:55:03	344172992	FINEFOODS	10000	190	DSESBL	22232	1203510068173076	DSESBL	22240	1203510068348700	Block	1203510068173076 Mohammad Shamsul Alam	1203510068348700 DIPIKA SAHA
25-11-24	14:02:10	344179216	FINEFOODS	10000	190.5	DSESBL	22240	1203510068348700	DSESBL	22341	1203510076533574	Block	1203510068348700 DIPIKA SAHA	1203510076533574 Ambia Enterprise
Total		21		25400										

(as per DSE trade data)

Finding-2:

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

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

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

It is found that Ambia Enterprise and associates acted as counter party of each other for 25400 shares of FINEFOODS 05-11-2024, 24-11-2024 & 25-11-2024 in 21 howlas in the public & block market.

Contravention-2:

It appears that Ambia Enterprise (BOID# 1203510076533574), Mohammad Shah Alam Minto (BOID# 1203510076679582) Mohammad Shamsul Alam (BOID# 1203510068173076) and DIPIKA SAHA (BOID# 1203510068348700) have violated the following:

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

INDIVIDUAL TRADE PATTERN

1. **TRADE DETAILS OF AMBIA ENTERPRISE & MOHAMMAD SHAMSUL ALAM:**
   I. **Individual Trade Patterns of AMBIA ENTERPRISE & MOHAMMAD SHAMSUL ALAM (Only Public Market):**

Date	Code # 22341				Code # 22232				Total					
	BO ID # 1203510076533574				BO ID # 1203510068173076									
	AMBIA ENTERPRISE				MOHAMMAD SHAMSUL ALAM									
	Stock & Bond Limited				Stock & Bond Limited									
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
28-Oct-24	0	0.00	0	0.00	5	152.50	0	0.00	5	152.50	762.50	0	0.00	0.00
29-Oct-24	0	0.00	0	0.00	990	152.60	0	0.00	990	152.60	151074.00	0	0.00	0.00
30-Oct-24	0	0.00	0	0.00	0	0.00	1	158.60	0	0.00	0.00	1	158.60	158.60
3-Nov-24	0	0.00	0	0.00	210	158.79	1210	157.12	210	158.79	33345.00	1210	157.12	190121.00
4-Nov-24	0	0.00	0	0.00	649	159.80	649	161.60	649	159.80	103710.20	649	161.60	104878.40
5-Nov-24	0	0.00	0	0.00	1050	163.67	52	166.00	1050	163.67	171850.00	52	166.00	8632.00
6-Nov-24	0	0.00	0	0.00	0	0.00	1050	171.90	0	0.00	0.00	1050	171.90	180495.00
11-Nov-24	0	0.00	11244	170.95	0	0.00	0	0.00	0	0.00	0.00	11244	170.95	1922117.70
12-Nov-24	0	0.00	32209	168.00	0	0.00	0	0.00	0	0.00	0.00	32209	168.00	5411117.80
13-Nov-24	13000	173.81	5	170.10	0	0.00	0	0.00	13000	173.81	2259535.40	5	170.10	850.50
20-Nov-24	0	0.00	0	0.00	0	0.00	24950	212.44	0	0.00	0.00	24950	212.44	5300344.30
21-Nov-24	0	0.00	0	0.00	0	0.00	15942	215.89	0	0.00	0.00	15942	215.89	3441760.20
24-Nov-24	0	0.00	72727	205.87	0	0.00	22548	206.29	0	0.00	0.00	95275	205.97	19623736.50
25-Nov-24	0	0.00	3077	199.31	0	0.00	0	0.00	0	0.00	0.00	3077	199.31	613275.90
26-Nov-24	0	0.00	0	0.00	0	0.00	26560	208.88	0	0.00	0.00	26560	208.88	5547793.80
27-Nov-24	0	0.00	0	0.00	5000	209.00	10000	206.34	5000	209.00	1045000.00	10000	206.34	2063389.50
28-Nov-24	0	0.00	0	0.00	0	0.00	5000	213.92	0	0.00	0.00	5000	213.92	1069600.00
2-Dec-24	0	0.00	0	0.00	5000	216.00	0	0.00	5000	216.00	1080000.00	0	0.00	0.00
4-Dec-24	0	0.00	0	0.00	0	0.00	4704	223.76	0	0.00	0.00	4704	223.76	1052586.00
8-Dec-24	0	0.00	0	0.00	58	210.30	0	0.00	58	210.30	12197.40	0	0.00	0.00
9-Dec-24	20000	212.04	0	0.00	15319	214.82	0	0.00	35319	213.25	7531610.90	0	0.00	0.00
10-Dec-24	8000	215.31	0	0.00	1496	215.05	0	0.00	9496	215.27	2044216.00	0	0.00	0.00
11-Dec-24	0	0.00	0	0.00	7556	202.98	0	0.00	7556	202.98	1533737.90	0	0.00	0.00
12-Dec-24	0	0.00	0	0.00	275	196.00	0	0.00	275	196.00	53900.00	0	0.00	0.00
15-Dec-24	42000	209.51	0	0.00	5000	210.00	0	0.00	47000	209.56	9849439.40	0	0.00	0.00
17-Dec-24	0	0.00	0	0.00	10000	214.84	0	0.00	10000	214.84	2148386.00	0	0.00	0.00
Total	83000		119262		52608		112666		135608			231928		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by AMBIA ENTERPRISE & MOHAMMAD SHAMSUL ALAM:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									206325	171.76	35438139.00						
28-10-24	5	152.50	762.50	0	0.00	0.00	0.00	0.00	206330	171.76	35438901.50	14758	152.70	-1.99%	0.03%	0.00%	0.03%
29-10-24	990	152.60	151074.00	0	0.00	0.00	0.00	0.00	207320	171.67	35589975.50	39295	152.80	0.07%	2.52%	0.00%	2.52%
30-10-24	0	0.00	0.00	1	158.60	158.60	171.67	171.67	207319	171.67	35589803.83	309998	157.50	3.08%	0.00%	0.00%	0.00%
03-11-24	210	158.79	33345.00	1210	157.12	190121.00	171.65	207701.14	206319	171.65	35415447.69	19330	156.50	-0.63%	1.09%	6.26%	7.35%
04-11-24	649	159.80	103710.20	649	161.60	104878.40	171.62	111379.22	206319	171.62	35407778.68	305349	161.10	2.94%	0.21%	0.21%	0.43%
05-11-24	1050	163.67	171850.00	52	166.00	8632.00	171.58	8921.97	207317	171.58	35570706.70	58063	168.70	4.72%	1.81%	0.09%	1.90%
06-11-24	0	0.00	0.00	1050	171.90	180495.00	171.58	180155.23	206267	171.58	35390551.47	79358	171.00	1.36%	0.00%	1.32%	1.32%
11-11-24	0	0.00	0.00	11244	170.95	1922117.70	171.58	1929205.16	195023	171.58	33461346.31	72504	168.80	-3.98%	0.00%	15.51%	15.51%
12-11-24	0	0.00	0.00	32209	168.00	5411117.80	171.58	5526304.61	162814	171.58	27935041.71	774406	168.00	-0.47%	0.00%	4.16%	4.16%
13-11-24	13000	173.81	2259535.40	5	170.10	850.50	171.74	858.71	175809	171.74	30193718.40	117524	173.80	3.45%	11.06%	0.00%	11.07%
20-11-24	0	0.00	0.00	24950	212.44	5300344.30	171.74	4284952.84	150859	171.74	25908765.56	591917	214.90	7.83%	0.00%	4.22%	4.22%
21-11-24	0	0.00	0.00	15942	215.89	3441760.20	171.74	2737904.54	134917	171.74	23170861.02	491225	214.20	-0.33%	0.00%	3.25%	3.25%
24-11-24	0	0.00	0.00	95275	205.97	19623736.50	171.74	16362680.64	39642	171.74	6808180.38	444570	206.20	-3.73%	0.00%	21.43%	21.43%
25-11-24	10000	190.00	1900000.00	13077	192.57	2518275.90	175.42	2293962.27	36565	175.42	6414218.11	358312	201.10	-2.47%	2.79%	3.65%	6.44%
26-11-24	0	0.00	0.00	26560	208.88	5547793.80	175.42	4659144.90	10005	175.42	1755073.22	560254	207.70	3.28%	0.00%	4.74%	4.74%
27-11-24	5000	209.00	1045000.00	10000	206.34	2063389.50	186.61	1866093.45	5005	186.61	933979.77	322214	209.00	0.63%	1.55%	3.10%	4.66%
28-11-24	0	0.00	0.00	5000	213.92	1069600.00	186.61	933046.72	5	186.61	933.05	359872	214.00	2.39%	0.00%	1.39%	1.39%
02-12-24	5000	216.00	1080000.00	0	0.00	0.00	0.00	0.00	5005	215.97	1080933.05	295443	217.50	1.64%	1.69%	0.00%	1.69%
04-12-24	0	0.00	0.00	4704	223.76	1052586.00	215.97	1015925.88	301	215.97	65007.16	203491	224.80	-1.06%	0.00%	2.31%	2.31%
08-12-24	58	210.30	12197.40	0	0.00	0.00	0.00	0.00	359	215.05	77204.56	262319	211.70	-4.25%	0.02%	0.00%	0.02%
09-12-24	35319	213.25	7531610.90	0	0.00	0.00	0.00	0.00	35678	213.26	7608815.46	200481	216.10	2.08%	17.62%	0.00%	17.62%
10-12-24	9496	215.27	2044216.00	0	0.00	0.00	0.00	0.00	45174	213.69	9653031.46	175732	215.80	-0.14%	5.40%	0.00%	5.40%
11-12-24	7556	202.98	1533737.90	0	0.00	0.00	0.00	0.00	52730	212.15	11186769.36	143784	203.50	-5.70%	5.26%	0.00%	5.26%
12-12-24	275	196.00	53900.00	0	0.00	0.00	0.00	0.00	53005	212.07	11240669.36	349373	198.40	-2.51%	0.08%	0.00%	0.08%
15-12-24	47000	209.56	9849439.40	0	0.00	0.00	0.00	0.00	100005	210.89	21090108.76	296257	209.90	5.80%	15.86%	0.00%	15.86%
17-12-24	10000	214.84	2148386.00	0	0.00	0.00	0.00	0.00	110005	211.25	23238494.76	330314	216.30	3.05%	3.03%	0.00%	3.03%
Total	145608	205.47	29918764.70	241928	200.21	48435857.20	174.09	42118408.94	110005	211.25	23238494.76						

III. Summary of the trade by AMBIA ENTERPRISE & MOHAMMAD SHAMSUL ALAM:

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	
10000	190.00	1900000.00	10000	190.50	1905000.00	145608	205.47	29918764.70	241928	200.21	48435857.20	174.09	42118408.94	110005	211.25	23238494.76	

IV. Gain and Loss by AMBIA ENTERPRISE & MOHAMMAD SHAMSUL ALAM from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	26.11	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	15.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	63,17,448.26	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	7.35	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	3.48%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	8,08,598.24	Quantity of Stock Position x Unrealized gain (loss) per unit

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2. TRADE DETAILS OF MD SHAFIQUR RAHMAN:

I. Individual Trade Patterns of MD SHAFIQUR RAHMAN (Only Public Market):

Date	Code # 22342				Code # 22248				Total					
	BO ID # 1203510076873590				BO ID # 1203510016561598									
	MD SHAFIQUR RAHMAN				MD. SHAFIQUR RAHMAN									
	Stock & Bond Limited				Stock & Bond Limited									
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
30-Oct-24	4000	156.18	0	0.00	0	0.00	0	0.00	4000	156.18	624700.00	0	0.00	0.00
31-Oct-24	4000	158.16	0	0.00	0	0.00	0	0.00	4000	158.16	632645.00	0	0.00	0.00
4-Nov-24	200	159.64	0	0.00	0	0.00	0	0.00	200	159.64	31927.10	0	0.00	0.00
10-Nov-24	0	0.00	0	0.00	0	0.00	3350	173.43	0	0.00	0.00	3350	173.43	580984.00
11-Nov-24	0	0.00	0	0.00	0	0.00	2400	171.78	0	0.00	0.00	2400	171.78	412282.10
26-Nov-24	0	0.00	8200	210.04	0	0.00	0	0.00	0	0.00	0.00	8200	210.04	1722330.10
15-Dec-24	7500	209.97	0	0.00	0	0.00	0	0.00	7500	209.97	1574755.00	0	0.00	0.00
17-Dec-24	2700	213.00	0	0.00	0	0.00	0	0.00	2700	213.00	575090.00	0	0.00	0.00
Total	18400		8200		0		5750		18400			13950		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by MD SHAFIQUR RAHMAN:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									5750	180.53	1038075.00						
30-10-24	4000	156.18	624700.00	0	0.00	0.00	0.00	0.00	9750	170.54	1662775.00	309998	157.50	3.08%	1.29%	0.00%	1.29%
31-10-24	4000	158.16	632645.00	0	0.00	0.00	0.00	0.00	13750	166.94	2295420.00	19809	157.50	0.00%	20.19%	0.00%	20.19%
04-11-24	200	159.64	31927.10	0	0.00	0.00	0.00	0.00	13950	166.83	2327347.10	305349	161.10	2.94%	0.07%	0.00%	0.07%
10-11-24	0	0.00	0.00	3350	173.43	580984.00	166.83	558896.97	10600	166.83	1768450.13	152373	175.80	2.33%	0.00%	2.20%	2.20%
11-11-24	0	0.00	0.00	2400	171.78	412282.10	166.83	400403.80	8200	166.83	1368046.32	72504	168.80	-3.98%	0.00%	3.31%	3.31%
26-11-24	0	0.00	0.00	8200	210.04	1722330.10	166.83	1368046.32	0	0.00	0.00	560254	207.70	3.28%	0.00%	1.46%	1.46%
15-12-24	7500	209.97	1574755.00	0	0.00	0.00	0.00	0.00	7500	209.97	1574755.00	296257	209.90	5.80%	2.53%	0.00%	2.53%
17-12-24	2700	213.00	575090.00	0	0.00	0.00	0.00	0.00	10200	210.77	2149845.00	330314	216.30	3.05%	0.82%	0.00%	0.82%
Total	18400	186.91	3439117.10	13950	194.67	2715596.20	166.83	2327347.10	10200	210.77	2149845.00						

III. Summary of the trade by MD SHAFIQUR RAHMAN:

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
0	0.00	0.00	0	0.00	0.00	18400	186.91	3439117.10	13950	194.67	2715596.20	166.83	2327347.10	10200	210.77	2149845.00	

IV. Gain and Loss by MD SHAFIQUR RAHMAN from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	27.83	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	16.68%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	3,88,249.10	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	7.83	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	3.72%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	79,875.00	Quantity of Stock Position x Unrealized gain (loss) per unit

3. TRADE DETAILS OF ARBIM TECHO LTD:

I. Individual Trade Patterns of ARBIM TECHO LTD (Only Public Market):

Date	Code # 10550 BO ID # 1205670068895861 ARBIM TECHO LTD BD Sunlife Securities Ltd				Total					
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
3-Dec-24	20000	227.58	0	0.00	20000	227.58	4551520.00	0	0.00	0.00
11-Dec-24	14654	204.45	0	0.00	14654	204.45	2995998.80	0	0.00	0.00
Total	34654		0		34654			0		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by ARBIM TECHO LTD:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									705153	159.45	112436717.42						
19-11-24	0	0.00	0.00	50000	178.00	8900000.00	159.45	7972505.07	655153	159.45	104464212.35	1598208	199.30	8.32%	0.00%	3.13%	3.13%
03-12-24	20000	227.58	4551520.00	0	0.00	0.00	0.00	0.00	675153	161.47	109015732.35	602105	227.20	4.46%	3.32%	0.00%	3.32%
11-12-24	14654	204.45	2995998.80	0	0.00	0.00	0.00	0.00	689807	162.38	112011731.15	143784	203.50	-5.70%	10.19%	0.00%	10.19%
Total	34654	217.80	7547518.80	50000	178.00	8900000.00	159.45	7972505.07	689807	162.38	112011731.15						

III. Summary of the trade by ARBIM TECHO LTD:

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
0	0.00	0.00	50000	178.00	8900000.00	34654	217.80	7547518.80	50000	178.00	8900000.00	159.45	7972505.07	689807	162.38	112011731.15	

IV. Gain and Loss by ARBIM TECHO LTD from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	18.55	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	11.63%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	927494.93	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	56.22	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	34.62%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	38780079.05	Quantity of Stock Position x Unrealized gain (loss) per unit

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4. TRADE DETAILS OF MOHAMMAD SHAH ALAM MINTO:

I. Individual Trade Patterns of MOHAMMAD SHAH ALAM MINTO (Only Public Market):

Date	Code # 22339				Total					
	BO ID # 1203510076679582									
	MOHAMMAD SHAH ALAM MINTO									
	Stock & Bond Limited									
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
4-Nov-24	649	161.18	649	160.70	649	161.18	104605.30	649	160.70	104294.30
5-Nov-24	2000	164.89	2000	163.75	2000	164.89	329783.60	2000	163.75	327500.00
20-Nov-24	0	0.00	25555	212.39	0	0.00	0.00	25555	212.39	5427663.40
21-Nov-24	0	0.00	24145	211.92	0	0.00	0.00	24145	211.92	5116832.00
24-Nov-24	10000	208.27	0	0.00	10000	208.27	2082685.80	0	0.00	0.00
27-Nov-24	0	0.00	1000	208.36	0	0.00	0.00	1000	208.36	208356.40
28-Nov-24	0	0.00	9000	213.16	0	0.00	0.00	9000	213.16	1918404.10
8-Dec-24	6559	216.42	0	0.00	6559	216.42	1419514.60	0	0.00	0.00
11-Dec-24	3441	203.10	0	0.00	3441	203.10	698867.10	0	0.00	0.00
15-Dec-24	1000	204.96	0	0.00	1000	204.96	204955.10	0	0.00	0.00
Total	23649		62349		23649			62349		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by MOHAMMAD SHAH ALAM MINTO:

Date	Buy			Sale			Cost of shares sold			Stock Position		Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									49700	162.62	8082022.00						
04-11-24	649	161.18	104605.30	649	160.70	104294.30	162.60	105525.85	49700	162.60	8081101.45	305349	161.10	2.94%	0.21%	0.21%	0.43%
05-11-24	2000	164.89	329783.60	2000	163.75	327500.00	162.69	325372.73	49700	162.69	8085512.32	58063	168.70	4.72%	3.44%	3.44%	6.89%
20-11-24	0	0.00	0.00	25555	212.39	5427663.40	162.69	4157450.05	24145	162.69	3928062.27	591917	214.90	7.83%	0.00%	4.32%	4.32%
21-11-24	0	0.00	0.00	24145	211.92	5116832.00	162.69	3928062.27	0	0.00	0.00	491225	214.20	-0.33%	0.00%	4.92%	4.92%
24-11-24	10000	208.27	2082685.80	0	0.00	0.00	0.00	0.00	10000	208.27	2082685.80	444570	206.20	-3.73%	2.25%	0.00%	2.25%
27-11-24	0	0.00	0.00	1000	208.36	208356.40	208.27	208268.58	9000	208.27	1874417.22	322214	209.00	0.63%	0.00%	0.31%	0.31%
28-11-24	0	0.00	0.00	9000	213.16	1918404.10	208.27	1874417.22	0	0.00	0.00	359872	214.00	2.39%	0.00%	2.50%	2.50%
08-12-24	6559	216.42	1419514.60	0	0.00	0.00	0.00	0.00	6559	216.42	1419514.60	262319	211.70	-4.25%	2.50%	0.00%	2.50%
11-12-24	3441	203.10	698867.10	0	0.00	0.00	0.00	0.00	10000	211.84	2118381.70	143784	203.50	-5.70%	2.39%	0.00%	2.39%
15-12-24	1000	204.96	204955.10	0	0.00	0.00	0.00	0.00	11000	211.21	2323336.80	296257	209.90	5.80%	0.34%	0.00%	0.34%
Total	23649	204.68	4840411.50	62349	210.16	13103050.20	170.00	10599096.70	11000	211.21	2323336.80						

III. Summary of the trade by MOHAMMAD SHAH ALAM MINTO:

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
0	0.00	0.00	0	0.00	0.00	23649	204.68	4840411.50	62349	210.16	13103050.20	170.00	10599096.70	11000	211.21	2323336.80

IV. Gain and Loss by MOHAMMAD SHAH ALAM MINTO from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	40.16	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	23.62%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	25,03,953.50	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date

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Unrealized gain(loss) per unit	7.39	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	3.50%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	81,263.20	Quantity of Stock Position x Unrealized gain (loss) per unit

5. TRADE DETAILS OF BIKASH CHANDRA SARKER:

I. Individual Trade Patterns of BIKASH CHANDRA SARKER (Only Public Market):

Date	Code # 33167				Code # U0221				Total					
	BO ID # 1204120065465983				BO ID # 1605550058872405									
	BIKASH CHANDRA SARKER				BIKASH CHANDRA SARKER									
	Mah Securities Limited				Alpha Capital Management Limited									
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
20-Nov-24	0	0.00	5000	213.12	0	0.00	5300	205.20	0	0.00	0.00	10300	209.04	2153160.00
Total	0		5000		0		5300		0			10300		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by BIKASH CHANDRA SARKER:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									15300	147.16	2251478.06						
20-11-24	0	0.00	0.00	10300	209.04	2153160.00	147.16	1515700.92	5000	147.16	735777.14	591917	214.90	7.83%	0.00%	1.74%	1.74%
Total	0	0.00	0.00	10300	209.04	2153160.00	147.16	1515700.92	5000	147.16	735777.14						

III. Summary of the trade by BIKASH CHANDRA SARKER:

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	10300	209.04	2153160.00	147.16	1515700.92	5000	147.16	735777.14

IV. Gain and Loss by BIKASH CHANDRA SARKER from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	61.89	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	42.06%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	637459.08	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	71.44	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	48.55%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	357222.86	Quantity of Stock Position x Unrealized gain (loss) per unit

6. TRADE DETAILS OF SULTANA PARVIN:

I. Individual Trade Patterns of SULTANA PARVIN (Only Public Market):

Date	Code # 22246				Total					
	BO ID # 1203510068907832									
	SULTANA PARVIN									
	Stock & Bond Limited									
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
20-Nov-24	0	0.00	4970	211.40	0	0.00	0.00	4970	211.40	1050638.40
21-Nov-24	0	0.00	3975	212.20	0	0.00	0.00	3975	212.20	843495.00
9-Dec-24	5000	216.54	0	0.00	5000	216.54	1082720.00	0	0.00	0.00
11-Dec-24	2000	202.50	0	0.00	2000	202.50	405000.00	0	0.00	0.00
Total	**7000**		**8945**		**7000**			**8945**		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by SULTANA PARVIN:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									8945	167.49	1498162.00						
20-11-24	0	0.00	0.00	4970	211.40	1050638.40	167.49	832405.27	3975	167.49	665756.73	591917	214.90	7.83%	0.00%	0.84%	0.84%
21-11-24	0	0.00	0.00	3975	212.20	843495.00	167.49	665756.73	0	0.00	0.00	491225	214.20	-0.33%	0.00%	0.81%	0.81%
09-12-24	5000	216.54	1082720.00	0	0.00	0.00	0.00	0.00	5000	216.54	1082720.00	200481	216.10	2.08%	2.49%	0.00%	2.49%
11-12-24	2000	202.50	405000.00	0	0.00	0.00	0.00	0.00	7000	212.53	1487720.00	143784	203.50	-5.70%	1.39%	0.00%	1.39%
Total	7000	212.53	1487720.00	8945	211.75	1894133.40	167.49	1498162.00	7000	212.53	1487720.00						

III. Summary of the trade by SULTANA PARVIN:

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
0	0.00	0.00	0	0.00	0.00	7000	212.53	1487720.00	8945	211.75	1894133.40	167.49	1498162.00	7000	212.53	1487720.00	

IV. Gain and Loss by SULTANA PARVIN from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	44.27	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	26.43%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	3,95,971.40	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	6.07	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	2.86%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	42480.00	Quantity of Stock Position x Unrealized gain (loss) per unit

7. TRADE DETAILS OF AMINA BEGUM:

I. Individual Trade Patterns of AMINA BEGUM (Only Public Market):

Date	Code # 22254				Total					
	BO ID # 1203510069527644									
	AMINA BEGUM									
	Stock & Bond Limited									
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
20-Nov-24	0	0.00	2500	211.38	0	0.00	0.00	2500	211.38	528461.10
21-Nov-24	0	0.00	2000	212.20	0	0.00	0.00	2000	212.20	424400.00
24-Nov-24	2000	208.89	0	0.00	2000	208.89	417772.00	0	0.00	0.00
28-Nov-24	0	0.00	2000	214.50	0	0.00	0.00	2000	214.50	429000.00
10-Dec-24	300	216.00	0	0.00	300	216.00	64800.00	0	0.00	0.00
Total	2300		6500		2300			6500		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by AMINA BEGUM:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									4500	170.35	766564.00						
20-11-24	0	0.00	0.00	2500	211.38	528461.10	170.35	425868.89	2000	170.35	340695.11	591917	214.90	7.83%	0.00%	0.42%	0.42%
21-11-24	0	0.00	0.00	2000	212.20	424400.00	170.35	340695.11	0	0.00	0.00	491225	214.20	-0.33%	0.00%	0.41%	0.41%
24-11-24	2000	208.89	417772.00	0	0.00	0.00	0.00	0.00	2000	208.89	417772.00	444570	206.20	-3.73%	0.45%	0.00%	0.45%
28-11-24	0	0.00	0.00	2000	214.50	429000.00	208.89	417772.00	0	0.00	0.00	359872	214.00	2.39%	0.00%	0.56%	0.56%
10-12-24	300	216.00	64800.00	0	0.00	0.00	0.00	0.00	300	216.00	64800.00	175732	215.80	-0.14%	0.17%	0.00%	0.17%
Total	2300	209.81	482572.00	6500	212.59	1381861.10	182.21	1184336.00	300	216.00	64800.00						

III. Summary of the trade by AMINA BEGUM:

Summary																			
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
0	0.00	0.00	0	0.00	0.00	2300	209.81	482572.00	6500	212.59	1381861.10	182.21	1184336.00	300	216.00	64800.00

IV. Gain and Loss by AMINA BEGUM from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	30.39	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	16.68%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	1,97,525.10	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	2.60	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	1.20%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	780.00	Quantity of Stock Position x Unrealized gain (loss) per unit

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

8. TRADE DETAILS OF DIPIKA SAHA:

I. Individual Trade Patterns of DIPIKA SAHA (Only Public Market):

Date	Code # 22240 BO ID # 1203510068348700 DIPIKA SAHA Stock & Bond Limited				Total					
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
Total	0		0		0			0		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by DIPIKA SAHA:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									49000	130.78	6408439.00						
25-11-24	10000	190.50	1905000.00	10000	190.00	1900000.00	140.91	1409057.46	49000	140.91	6904381.54	358312	201.10	-2.47%	2.79%	2.79%	5.58%
Total	10000	190.50	1905000.00	10000	190.00	1900000.00	140.91	1409057.46	49000	140.91	6904381.54						

III. Summary of the trade by DIPIKA SAHA:

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
10000	190.50	1905000.00	10000	190.00	1900000.00	10000	190.50	1905000.00	10000	190.00	1900000.00	140.91	1409057.46	49000	140.91	6904381.54

IV. Gain and Loss by DIPIKA SAHA from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	49.09	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	34.84%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	4,90,942.54	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	77.69	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	55.14%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	38,07,018.46	Quantity of Stock Position x Unrealized gain (loss) per unit

9. TRADE DETAILS OF MD. MAMUN:

I. Individual Trade Patterns of MD. MAMUN (Only Public Market):

Date	Code # 22296 BO ID # 1203510074090491 MD. MAMUN Stock & Bond Limited				Total					
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
20-Nov-24	0	0.00	100	206.30	0	0.00	0.00	100	206.30	20630.00
Total	0		100		0			100		

&

Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by MD. MAMUN:

	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	ty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
ning lance									100	172.16	17216.00						
0-11-24	0	0.00	0.00	100	206.30	20630.00	172.16	17216.00	0	0.00	0.00	499624	214.90	7.83%	0.00%	0.02%	0.02%
Total	0	0.00	0.00	100	206.30	20630.00	172.16	17216.00	0	0.00	0.00						

III. Summary of the trade by MD. MAMUN:

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	100	206.30	20630.00	172.16	17216.00	0	0.00	0.00	

IV. Gain and Loss by MD. MAMUN from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	34.14	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	19.83%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	3,414.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	0.00	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	0.00%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	0.00	Quantity of Stock Position x Unrealized gain (loss) per unit

10. TRADE DETAILS OF MOHAMMAD ABDUL LATIF:

I. Individual Trade Patterns of MOHAMMAD ABDUL LATIF (Only Public Market):

Date	Code # 22302				Total					
	BO ID # 1203510074578548									
	MOHAMMAD ABDUL LATIF									
	Stock & Bond Limited									
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
28-Nov-24	0	0.00	2000	211.50	0	0.00	0.00	2000	211.50	423000.00
10-Dec-24	1000	212.00	0	0.00	1000	212.00	212000.00	0	0.00	0.00
11-Dec-24	990	209.26	0	0.00	990	209.26	207165.00	0	0.00	0.00
Total	1990		2000		1990			2000		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by MOHAMMAD ABDUL LATIF:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
28-11-24	0	0.00	0.00	2000	211.50	423000.00	0.00	0.00	-2000	0.00	0.00	359872	214.00	2.39%	0.00%	0.56%	0.56%
10-12-24	1000	212.00	212000.00	0	0.00	0.00	0.00	0.00	-1000	0.00	0.00	175732	215.80	-0.14%	0.57%	0.00%	0.57%
11-12-24	990	209.26	207165.00	0	0.00	0.00	0.00	0.00	-10	0.00	0.00	143784	203.50	-5.70%	0.69%	0.00%	0.69%
Total	1990	210.64	419165.00	2000	211.50	423000.00	0.00	0.00	-10	0.00	0.00						

III. Summary of the trade by MOHAMMAD ABDUL LATIF:

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		St	
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Pr
0	0.00	0.00	0	0.00	0.00	1990	210.64	419165.00	2000	211.50	423000.00	0.00	0.00	-10	0.00

IV. Gain and Loss by MOHAMMAD ABDUL LATIF from 28.10.2024 to 24.12.2024

Realized Capital gain(loss)per unit	211.50	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	0.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	4,23,000.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	0.00	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	0.00%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	0.00	Quantity of Stock Position x Unrealized gain (loss) per unit

11. TRADE DETAILS OF FARHANA AKTER:

I. Individual Trade Patterns of FARHANA AKTER (Only Public Market):

Date	Code # 22306 BO ID # 1203510075185407 FARHANA AKTER Stock & Bond Limited				Total					
40	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total
20-Nov-24	0	0.00	200	207.70	0	0.00	0.00	200	207.70	41540.00
21-Nov-24	0	0.00	1000	208.70	0	0.00	0.00	1000	208.70	208700.00
9-Dec-24	1000	216.25	0	0.00	1000	216.25	216245.00	0	0.00	0.00
Total	1000		1200		1000			1200		

II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by FARHANA AKTER:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Opening Balance									1200	180.90	217080.00						
20-11-24	0	0.00	0.00	200	207.70	41540.00	180.90	36180.00	1000	180.90	180900.00	591917	214.90	7.83%	0.00%	0.03%	0.03%
21-11-24	0	0.00	0.00	1000	208.70	208700.00	180.90	180900.00	0	0.00	0.00	491225	214.20	-0.33%	0.00%	0.20%	0.20%
09-12-24	1000	216.25	216245.00	0	0.00	0.00	0.00	0.00	1000	216.25	216245.00	200481	216.10	2.08%	0.50%	0.00%	0.50%
Total	1000	216.25	216245.00	1200	208.53	250240.00	180.90	217080.00	1000	216.25	216245.00						

III. Summary of the trade by FARHANA AKTER:

Summary																	
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount	
0	0.00	0.00	0	0.00	0.00	1000	216.25	216245.00	1200	208.53	250240.00	180.90	217080.00	1000	216.25	216245.00	

IV. **Gain and Loss by FARHANA AKTER from 28.10.2024 to 24.12.2024**

Realized Capital gain(loss)per unit	27.63	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	15.28%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	33,160.00	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	2.35	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	1.09%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	2,355.00	Quantity of Stock Position x Unrealized gain (loss) per unit

যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনর্ফোসমেন্ট বিভাগ কর্তৃক আগস্ট ০৬, ২০২৫ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৮৮৯ স্মারকমূলে Ambia Enterprise and Associates (associates are Md. Shafiqur Rahman, Mohammad Shamsul Alam, Arbim Techo Ltd., Md. Shafiqur Rahman & Bikash Chandra Sarker, Mohammad Shah Alam Minto, Ms. Sultana Parvin, Ms. Amina Begum, Ms. Dipika Saha, Md. Mamun, Mohammad Abdul Latif, Ms. Farhana Akter and Bikash Chandra Sarker)-কে আগস্ট ১৮, ২০২৫ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। আগস্ট ১৮, ২০২৫ ও পরবর্তীতে নির্ধারিত সেপ্টেম্বর ১০, ২০২৫ তারিখে শুনানীতে Ambia Enterprise, Mohammad Shamsul Alam, Arbim Techo Ltd., Mohammad Shah Alam Minto and Ms. Sultana Parvin এর পক্ষে Mr. Nasir Sikder, Advocate (on behalf); Md. Shafiqur Rahman, Ms. Amina Begum, Ms. Dipika Saha, Md. Mamun, Mohammad Abdul Latif and Ms. Farhana Akter এর পক্ষে Mr. Md. Hanif Uddin (on behalf) এবং Bikash Chandra Sarker নিজে ও Md. Shafiqur Rahman এর পক্ষে উপস্থিত হয়ে আগষ্ট ১৮, ২০২৫ এবং সেপ্টেম্বর ০৯, ২০২৫ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

A. **Explanation of Ambia Enterprise, Mohammad Shamsul Alam, Arbim Techo Ltd., Mohammad Shah Alam Minto and Ms. Sultana Parvin** ***(All the explanations are same):***

"Our Response to the Allegations:

1. *respectfully deny that there was any willful or deliberate contravention of Section 17(e) (v) of the Securities and Exchange Ordinance, 1969.*
2. *That the most serious allegation, namely influenced to uplift the price of shares of "FINEFOODS" has not actually been admitted or proven, but rather, the facts and circumstances clearly show that I am not individually or jointly holding 10% shares of the FINEFOODS and thereby I have not violated any of the prevailing rules and regulations of the Securities and Exchange Commission.*
3. *I am a separate individual and duly registered as proprietor concern and have a separate BO ID account and each account are operated separately and I have not bought any shares jointly and hence the commission cannot put myself under the heading Ambia Enterprise and Associate and thus cannot make liable for any acts mentioned in the show cause notice.*

4. *For that the each BO account is separate unless the same is opened and maintained jointly. There is nothing in the law which can cumulatively make a number of individual person under the heading "Associates: and put all of them liable for the breach of a particular section and impose fine and thus order of imposition of penalty is illegal and without lawful authority.*

5. *That it is stated that the Stock and Bond Limited (brokerage house) mistakenly put my email address to some of their clients account and I have no connection with that particular accounts or accounts holder and hence allegation on the basis of same email address is misnomer and not tenable in the eye of law.*

With the above aspect I pray that the Commission kindly accepts this explanation as sufficient cause and not take any penal action under Section 22 of the Securities and Exchange Ordinance, 1969. I humbly assure the Commission of my full cooperation and continued compliance with the securities laws of Bangladesh."

B. Explanation of Md. Shafiqur Rahman, Ms. Amina Begum, Ms. Dipika Saha, Md. Mamun, Mohammad Abdul Latif and Ms. Farhana Akter *(All the explanations are same)*: -

"Whereas, pursuant to surveillance Note- BSEC letter ref no. BSEC/Surveillance/2023-0097/403 dated December 24, 2024 the investigation team of DSE investigated share trading of Fine Foods Limited ("FINEFOODS") for the period from 28.10.2024 to 24.12.2024, the investigation report which was submitted by the team on the trade of "FINEFOODS is quite strategic and ethical. As per the section 17 of the Securities and Exchange Ordinance, 1969, sub clause (e), (v) and (e) (ii), the trading of the said share was quite violation and contravention to the Securities related rules. As a small investor I do not have enough idea about the series of transactions. I have just brought the said share "FINEFOODS" seeing the computer screen. I have no relation with the Abmia Enterprise and Associates. After receiving the letter from surveillance department, I have strongly concerned about the matter how this violation was occurred. Finding the incidences, I became very much ashamed of it. In this regard, I submitted a written reply addressing you which is self-explanatory for your kind perusal and sympathetic consideration. It is regret to say that I could not ascertain the rate of "FINEFOODS" share on that period of Trading.

I hope that you would be satisfied on my explanation as above. I am really sorry and ashamed for the incidence that is committed very unintentionally for the unusual trading of "FINEFOODS which is straight violation of Securities related Rules. I always try upto the best to control myself abiding by the BSEC. DSE rules, regulations, orders and instructions sincerely. I am giving assurance that I will take enough measures about such types of mistake in the future and solicit your sympathy to make myself more alert. I also hope that you will give me an opportunity and earnestly requesting you kindly to remit me from the charge."

C. **Explanation of Bikash Chandra Sarker and Md. Shafiqur Rahman & Bikash Chandra Sarker (1st para the explanations are same):-**

(i) **Md. Shafiqur Rahman & Bikash Chandra Sarker (Joint Account)**

1st Para

"Whereas, pursuant to surveillance Note- BSEC letter ref. no BSEC/Surveillance/2023-0097/403 dated December 24, 2024 the investigation team of DSE investigated share trading of Fine Foods Limited ("FINEFOODS) for the period from 28.10.2024 to 24.12.2024, the investigation report which was submitted by the team on the trade of "FINEFOODS is quite strategic and ethical. As per the section 17 of the Securities and Exchange Ordinance, 1969, sub clause (e), (v) and (e) (ii), the trading of the said share was quite violation and contravention to the Securities related rules.

As a small investor I do not have enough idea about the series of transactions. I have just brought the said share "FINEFOODS" seeing the computer screen. I have no relation with the Abmia Enterprise and Associates. After receiving the letter from surveillance department I have strongly concerned about the matter how this violation was occurred. Finding the incidences, I became very much ashamed of it. In this regards, I submitted a written reply addressing you which is self-explanatory for your kind perusal and sympathetic consideration. It is regret to say that I could not ascertain the rate of "FINEFOODS" share on that period of Trading.

I hope that you would be satisfied on my explanation as above. I am really sorry and ashamed for the incidence that is committed very unintentionally for the unusual trading of "FINEFOODS" which is straight violation of Securities related Rules. I always try upto the best to control myself abiding by the BSEC, DSE rules, regulations, orders and instructions sincerely. I am giving assurance that I will take enough measures about such types of mistake in the future and solicit your sympathy to make myself more alert. I also hope that you will give me an opportunity and earnestly requesting you kindly to remit me from the charge."

(ii) **Bikash Chandra Sarker**

"1st Para"

"During the period under investigation from 28.10.2024 to 24.12.2024 I had made the following transactions of FINEFOODS in BO account held in my name as follows.

Broker	BOID	Date	Buy /Sale	Quantity	Remarks
Alpha Capital Management	1605550058872405	20.11.2024	Sale	5,300	Bought on 01.09.2024
MAH Securities Ltd.	1204120065465983	20.11.2024	Sale	5,000	Bought on 28 02 2024

From the above, it is seen than I had bought small quantity shares of the mentioned company about 2.5-8.5 month earlier from the date of sales. As a small investor in the capital market, it seems to me that the company may give future capital gain at the time of buy, I had just bought the shares on the date as mentioned above. It should be mentioned here that during the period under investigation I did not buy any share of the company as mentioned.

I hope that you would be satisfied on my explanation as above. As a small investor I may in short of vast knowledge about rules & regulations relating to securities, however I always try my level best to comply with these regulations I am aware of."

যেহেতু, Ambia Enterprise and Associates (associates are Mr. Md. Shafiqur Rahman, Mr. Mohammad Shamsul Alam, Arbim Techo Ltd., Mr. Md. Shafiqur Rahman & Bikash Chandra Sarker, Mr. Mohammad Shah Alam Minto, Ms. Sultana Parvin, Ms. Amina Begum, Ms. Dipika Saha, Mr. Md. Mamun, Mr. Mohammad Abdul Latif, Ms. Farhana Akter and Mr. Bikash Chandra Sarker) -এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্থ হয়েছেন যা পুঁজিবাজার উন্নয়নেরও পরিপন্থী, সেহেতু এক্ষেত্রে Ambia Enterprise and Associates-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Ambia Enterprise and Associates-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section 17(e)(ii) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Ambia Enterprise and Associates-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 Ambia Enterprise and Associates-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-

- Ambia Enterprise-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section17(e)(ii) লঙ্ঘনের দায়ে যথাক্রমে ১.০০ (এক) লক্ষ ও ১.০০ (এক) লক্ষ টাকা **সর্বমোট ২.০০ (দুই) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Md. Shafiqur Rahman-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **৩.৫০ (তিন দশমিক পাঁচ শূন্য) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Mohammad Shamsul Alam-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section17(e)(ii) লঙ্ঘনের দায়ে যথাক্রমে ৫৬.০০ (ছাপান্ন) লক্ষ ও ১.০০ (এক) লক্ষ টাকা **সর্বমোট ৫৭.০০ (সাতান্ন) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Arbim Techo Ltd.-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **৮.৩৫ (আট দশমিক তিন পাঁচ) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Bikash Chandra Sarker-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **৫.৭৫ (পাঁচ দশমিক সাত পাঁচ) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Mohammad Shah Alam Minto-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section17(e)(ii) লঙ্ঘনের দায়ে যথাক্রমে ২২.৫০ (বাইশ দশমিক পাঁচ শূন্য) লক্ষ ও ১.০০ (এক) লক্ষ টাকা **সর্বমোট ২৩.৫০ (তেইশ দশমিক পাঁচ শূন্য) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Ms. Sultana Parvin-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **৩.৫৫ (তিন দশমিক পাঁচ পাঁচ) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Ms. Amina Begum-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **১.৭৫ (এক দশমিক সাত পাঁচ) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।

- Ms. Dipika Saha-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section17(e)(ii) লঙ্ঘনের দায়ে যথাক্রমে ৪.৪০ (চার দশমিক চার শূন্য) লক্ষ ও ১.০০ (এক) লক্ষ টাকা **সর্বমোট ৫.৪০ (পাঁচ দশমিক চার শূন্য) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Md. Mamun-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **১.০০ (এক) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Mr. Mohammad Abdul Latif-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **৩.৮০ (তিন দশমিক আট শূন্য) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।
- Ms. Farhana Akter-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) লঙ্ঘনের দায়ে **১.০০ (এক) লক্ষ টাকা** অর্থদন্ড ধার্য্য করল।

উক্ত অর্থদন্ড ব্যক্তিগত দায় হিসাবে 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,

Nahid mahtab
নাহিদ মাহতাব 04.08.26
কমিশনার

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