

7. Details of shareholding/unit holding of foreigner, institution and shareholder who holds 5% or more securities outstanding other than sponsors/directors:

Sl. No.	Name of foreigner, institution and shareholder who holds 5% or more other than sponsors/directors	No. of shares held as on end of the month		% of total no. of paid-up securities as on end of the month		No. of securities increased/ (decreased) during reported period (A)-(B)	Reason for changes
		Reporting month 31.10.2021 (A)	Previous month 30.09.2021 (B)	Reporting month 31.10.2021	Previous month 30.09.2021		
1	Bengal Vacation Club Ltd	9,940,296	9,940,296	8.23%	8.23%	-	N/A
Total		9,940,296	9,940,296	8.23%	8.23%	-	

Yours faithfully,

For Sea Pearl Beach Resort & Spa Ltd,



Md. Azaharul Mamun
Company Secretary

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