





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 31.10.2019 (A)	Previous month 30.09.2019 (B)	Reporting month 31.10.2019	Previous month 30.09.2019		
1	Bengal Vacation Club Ltd	9,466,949	9,466,949	8.23%	8.23%	-	
	<b>Total</b>	<b>9,466,949</b>	<b>9,466,949</b>	<b>8.23%</b>	<b>8.23%</b>	-	

Yours faithfully,

For Sea Pearl Beach Resort & Spa Ltd,



**Md. Azaharul Mamun**  
Company Secretary

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