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Day | Date : Tuesday, December 10, 2024

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To,
The Executive Director
BSE Limited,
[Investigation / Surveillance Department]

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Subject : Price of the scrip of our company has seen an abnormal price rise, which was not supported by any corporate announcements or material changes in the business activities of our Company and manipulative trade observed in our scrip and request Urgent attention for possible MISUSE / UNETHICAL / UNUSUAL TRADES in our Company scrip.

Company name : CENTENIAL SURGICAL SUTURE LTD. Scrip no. : 531308

Madam / Sir,

In continuation of our earlier letters and as per the past trading of 2020, 2021, 2022, 2023 and this correspondence, as noticed on BSE Limited, Mumbai, Maharashtra, our company, CENTENIAL SURGICAL SUTURE LTD., Scrip no.: 531308, we have observed that there have been unusual trades in the company shares.

Today, Tuesday, December 10, 2024 we observe that 41 equity share are traded and the share price is Rs.133.95. Today, 5 shares & 10 shares are traded at Rs.134.95, 24 shares are traded at Rs.134.00 and 1 share is traded at Rs.133.95.

This is CERTAINLY premediated.



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Once again, please catch the offender & arrest him.

Considering the trading pattern of the Company and absence of any documents to support those justifications advanced, SEBI was of the view that the said acts were not genuine and such trades were sufficient to mislead and induce the genuine investors to deal in the securities market.

Acts of a party can be proven to be malafide and manipulative in nature, even in the absence of any proven nexus with the counter party buyers or any allegation of collusion/nexus with any other person.

It is common understanding that if a reasonable person claims to reap benefits out of a scrip of a company before others get into said scrip, such a person would naturally buy the shares and wait for the price to rise, which will happen if the scrip becomes popular and such person can then sell those shares so as to make some profit. Under no circumstances, a person who is anticipating the share to become popular, will ever enter into short sell of such shares. The act of short selling therefore expresses the inherent intention that of expecting a price fall in the scrip.

In the absence of any cogent reason to justify repeated acts of indulging in unsuccessful short selling in the shares of the Company that too always at prices higher than the LTP, there cannot be any motive except for an intention to carry out an agenda to manipulate the price, implemented meticulously, in the scrip of the Company.

Finally, any transaction executed with the intention to defeat the market mechanism whether negotiated or not would be illegal. Whether a transaction has been executed with the intention to manipulate the market or defeat its mechanism will depend upon the intention of the parties which could be inferred from the attending circumstances because direct evidence in such cases may not be available. The nature of the transaction executed, the frequency with which such transactions are undertaken, the value of the transactions, whether they involve circular trading and whether there is real change of beneficial ownership, the conditions then prevailing in the market are some of the factors which go to show the intention of the parties. This list of factors, in the very nature of things, cannot be exhaustive. Any one factor may or may not be decisive and it is from the cumulative effect of these that an inference will have to be drawn.

This kind of trading is an unfair practice that needs to be avoided and controlled at all costs. This manipulative trade observed is a transaction executed with the intention only to defeat the market mechanism is illegal as the intention to manipulate the market or defeat its mechanism more robust mechanism for investigation and prosecution is

still required, an effective investigative system and a vigilant approach, which will not allow offenders to elude capture.

This artificially raising of the price of our scrip, we can see there is collusion between buyer and seller. This manipulative trade observed is a transaction executed with the intention only to defeat the market mechanism is illegal as the intention to manipulate the market or defeat its mechanism the intention of the parties can be inferred from the number of share which are always 1, 2, 5, 10 shares and this direct evidence is available with the stock exchange.

Further, the nature of the transaction executed, the frequency within which such transactions are undertaken, the value of transactions, indicates circular trading and there is no real change of beneficial ownership, and the conditions prevailing in the market go to show the manipulative intention of the parties.

Hence, we can certainly conclude that in our case the transactions go on to show that the trades as well as the transfer of shares which preceded such trades were all part of a pre-mediated arrangement with the sole purpose of stirring up the price of our scrip and to create artificial appearance of trading in the said scrip so as to induce the investors to trade in our scrip.

After taking into consideration all the PAST facts and circumstances IN TRADING of our scrip case, gravity of violations and the material on record we notice an unusual movement in the price in the scrip of our company. We request your office to undertake an investigation relating to the trading activities in to ascertain whether the unusual price movement was normal or it was caused by unscrupulous acts of possible manipulation of the price of the scrip of the Company and based on the factual analysis and observations we are of the opinion that these trades established are clearly manipulative and unfair.

In the price of our scrip of our company you can see an abnormal rise, which was not supported by any corporate announcements or material changes in the business activities of our Company. It was noticed that several entities bought and sold the shares of the Company at a price higher than the last traded price (LTP) and contributed to the positive LTP.

Our records of our internal investigation further revealed that out of the said sellers, top five buyers and sellers contributed more than 90% to the market positive LTP variance of our scrip. Some of the sellers were noticed to be selling their shares in miniscule quantities, despite having sufficient quantities of shares in their respective demat accounts. These sellers were also executing trades at a price higher than the LTP.

We can certainly conclude that the shares of our Company were not a genuine transaction and was carried out only for the purpose of facilitating manipulation in the price of the scrip.

This is CERTAINLY misconduct and attracts serving of a Show Cause Notice (SCN) which alleged that all the above mentioned acts were in contravention of the provisions of Regulations 3 (a), (b), (c), and (d) and 4(1), (2), (a), and (e) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003 (PFUTP Regulations).

This is serious misconduct and manipulation to increase the price.

The total number of shares purchased and sold and the price rise, there appears to be misuse of stock market trades for share price increase manipulation and violation of securities laws of our country.

Our company's share price has shot up considerably and price manipulation by increasing the last trading share price every time the company's share scrip was traded on the BSE Limited and 1, 2 & 5 equity shares are traded.

Further, our company has not made any announcement which is of material nature to encourage this significant increase in the share price and we are seeking a probe on the unusual trading pattern. We feel that there are some persons / parties / company's trying to manipulate the price of our company's shares with vested interest. Hence, we request you to intervene in the matter and conduct a complete investigation in this scrip.

The company has not undertaken any activity which has any sort of bearing on the movement in the price of its shares and our company has no pending announcements to be made to the Stock Exchange. Further, as per the data and information available with our company, no Promoters or any Key

Managerial Personnel or any designated employees of our company and their immediate relatives have traded in shares of our company.

We as the company / promoters are ready for any kind of assistance that is required in a detailed investigation for probable violation of securities laws. We hope that you will look into this matter on a priority basis.

Our company has taken a decision to approach you, to protect the interest of the shareholders and to curb any misuse, unethical or illegal activities which may have an adverse effect on the reputation of our company.

We once again wish to place on record that the Company, its Promoters, Directors or associates have no role in this misuse, unethical or illegal activities.

We urge and request your good offices to investigate the movement and operations in the CENTENIAL SURGICAL SUTURE LTD., stock in the recent past and initiate appropriate penal actions against concerned broking house(s) and/or their clients to ensure that the conspirators are brought to book immediately, rather be treated as an emergency.

Sincerely,

for **CENTENIAL SURGICAL SUTURE LTD.**



**MAHIMA
BATHWAL**

Digitally signed by
MAHIMA
BATHWAL
Date: 2024.12.10
13:05:31 +05'30'

Mahima BATHWAL
Membership No. ACS A35069
Company Secretary & Compliance Officer

c.c.

The Executive Director

**[Investigation / Surveillance Department]
SECURITIES & EXCHANGE BOARD OF INDIA (SEBI)**

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