

Date: April 08, 2024

To
BSE Limited
1st Floor, P.J. Towers,
Dalal Street, Mumbai - 400001
Scrip Code: 506642

To
National Stock Exchange of India Limited
Exchange plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (E),
Mumbai - 400051, India
Symbol: SADHNANIQ

Subject: Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

Dear Sir/Madam,

Pursuant to the provisions of the Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, I Asit D. Javeri, hereby declare that we, the Promoters and Persons Acting in Concert (**'PAC'**) of Sadhana Nitro Chem Limited (**'Company'**) have not made any encumbrance, directly or indirectly on any shares of Company other than already disclosed during the financial year to BSE Limited and NSE Limited.

Further as of March 31, 2024, the number of encumbered shares by Promoter and Person Acting in Concert is as follows:

Name	Promoter or PAC	Total shares encumbered	% of total equity share capital
Manekchand Panachand Trading Investment Co. Pvt. Ltd.	Promoter	2,18,69,949	8.85
Asit Javeri	Promoter	10,27,500	0.42
Rahat Sandeep Shah	Promoter Group	20,000	0.00

Kindly take the same in your records.

Thanking You,

For and on behalf of all the Promoters and Persons acting in concert of Sadhana Nitro Chem Limited

Asit D. Javeri
Promoter
Address: Ratnagar Palace, 37 Chowpatty Seaface,
Mumbai-400007.

CC: - Audit Committee of Sadhana Nitro Chem Limited

***Note:** As per Securities Exchange and Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 the term encumbrance shall include:

- (a) any restriction on the free and marketable title to shares, by whatever name called, whether executed directly or indirectly;
- (b) pledge, lien, negative lien, non-disposal undertaking; or
- (c) any covenant, transaction, condition, or arrangement in the nature of encumbrance, by whatever name called, whether executed directly or indirectly.

Encl: (Annexure -I List of Promoters with their shareholding)

Annexure I

List of Promoters and Persons acting in concert and their shareholding

Sr. No.	Name	Promoter & Promoter Group	No. of Shares	%
1.	Manekchand Panachand Trading Investment Co Pvt Ltd	Promoter	15,29,58,115	61.9117
2.	Asit Javeri	Promoter	46,05,811	1.8643
3.	Abhishek Asit Javeri	Promoter Group	20,14,729	0.8155
4.	Chandrika Dhankumar Javeri	Promoter Group	7,49,210	0.3033
5.	Sadhana Rajiv Jain	Promoter Group	7,49,210	0.3033
6.	Anuradha Merchant	Promoter Group	4,77,400	0.1932
7.	Seema Asit Javeri	Promoter Group	4,70,393	0.1904
8.	Molina Dhankumar Javeri	Promoter Group	25,666	0.0104
9.	Amita Vijayraj Parekh	Promoter Group	26,180	0.0106
10.	Nisheeta Sanjay Agarawala	Promoter Group	-	-
11.	Rahat Sandeep Shah	Promoter Group	1,08,027	0.0437
12.	Asit D. Javeri (HUF)	Promoter Group	-	-
13.	Lifestyle Net Works Limited	Promoter Group	-	-
14.	Chandra Net Limited	Promoter Group	-	-
15.	M.P. & Co.	Promoter Group	-	-
16.	Hg Partners Llp	Promoter Group	500	0.0002
	Total		16,21,85,241	65.6466

For and on behalf of all the Promoters and Persons acting in concert of Sadhana Nitro Chem Limited

Asit D. Javeri
Promoter

Address: Ratnagar Palace, 37 Chowpatty Seaface,
Mumbai-400007