



SADHANA NITRO CHEM LIMITED

Date: 28th October, 2025

To,
**The Department of Corporate Services,
Listing Department
BSE Limited**
Phiroze Jeejeebhoy Towers, Dalal Street,
Mumbai – 400001
Symbol: 506642

To,
**The Listing Department
National Stock Exchange India Limited**
Exchange Plaza, Bandra Kurla Complex
Bandra (E), Mumbai-400051
Symbol: SADHNANIQ

Subject: Disclosure of Inter-se transfer of shares between Promoters / Promoter Group in accordance with Regulation 10(5) of SEBI (SAST) Regulations, 2011

Dear Sir/ Madam,

With reference to the captioned subject, we would like to inform that the Company has received an intimation regarding inter-se transfer of shares amongst promoter group as follows:

Date of Transaction on or after	Name of person (belongs to promoter group) Transferor	Name of the Transferee/ Acquirer	Number of shares proposed to be acquired by consideration	% of holding
31 st October, 2025	Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC03 7397)	1.Mr. Asit Dhankumar Javeri 2. Mr. Abhishek Asit Javeri	A.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Asit Dhankumar Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd B.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Abhishek Asit Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd	26.6469

This transaction, being an inter-se transfer of shares amongst the Promoter Group, falls within the exemptions provided under Regulation 10(1)(a)(ii) of the SEBI (SAST) Regulations, 2011. Consequent to the above acquisition, the Equity Shareholding of the said Acquirers in the Company will be 1. Asit Dhankumar Javeri (4,85,90,726 shares) and Mr. Abhishek Asit Javeri (4,66,32,262 shares) And the Transferor's Shareholding will remain 1021 (One Thousand and Twenty One) equity shares.

The Aggregate holding of Promoter and Promoter Group before and after the above inter se transaction remains the same.

Corporate Office

10, Bruce Street, 1st Floor,
8/12, Homi Mody Street, Fort,
Mumbai - 400001

Factory Address

47, MIDC, Roha - 402116.
Dist. Raigad (M.S.)
Dhatav, Maharashtra

Registered Office

Nanavati Mahalaya, Unit No. 501,
5th Floor, 18 Homi Mody Street
Fort, Mumbai - 400001





SADHANA NITRO CHEM LIMITED

In this connection necessary disclosure under Regulation 10(5) for the above said acquisition in prescribed format, as submitted by the Acquirer is enclosed herewith for your kind information and records.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,

FOR SADHANA NITROCHEM LIMITED

Nitin Rameshchandra Jani
Company Secretary
Membership No.: A4757



Corporate Office
10, Bruce Street, 1st Floor,
8/12, Homi Mody Street, Fort,
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5th Floor, 18 Homi Mody Street
Fort, Mumbai - 400001

Asit Dhankumar Javeri
Abhishek Asit Javeri
Ratnagar Palace
37 Chowpatty Seaface,
Mumbai-400007, India

Date: 28th October, 2025

To,
The Department of Corporate Services,
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street,
Mumbai – 400001
Symbol: 506642

To,
The Listing Department
National Stock Exchange India Limited
Exchange Plaza, Bandra Kurla Complex
Bandra (E), Mumbai-400051
Symbol: SADHNANIQ

Subject: Submission of Disclosure under Regulation 10(5) of the SEBI (SAST) Regulations, 2011

Dear Sir/ Madam,

We hereby submit the disclosure as required under Regulation 10(5) of the SEBI (SAST) Regulations, 2011 for acquisition of equity shares as per the following details:

A.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Asit Dhankumar Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd and B.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Abhishek Asit Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd held by Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397), Mr. Asit Dhankumar Javeri and Mr. Abhishek Asit Javeri all are promoters/ part of Promoter Group in Sadhana Nitro Chem Limited.

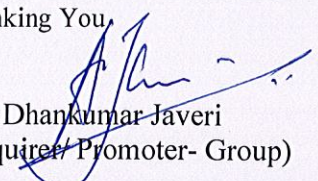
Date of Transaction on or after	Name of person (belongs to promoter group) Transferor	Name of the Transferee/ Acquirer	Number of shares proposed to be acquired by consideration	% of holding
31 st October, 2025	Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397)	1.Mr. Asit Dhankumar Javeri 2. Mr. Abhishek Asit Javeri	A.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Asit Dhankumar Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd B.4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Abhishek Asit Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd	26.6469

This transaction, being an inter-se transfer of shares amongst the promoter group, falls within the exemptions provided under Regulation 10(1)(a) (ii) of the SEBI (SAST) Regulations, 2011. The aggregate holding of Promoter and Promoter Group before and after the above inter – se transaction remains the same.

In this connection necessary disclosure under Regulation 10(5) for the above said acquisition in the prescribed format is enclosed herewith for your kind information and records.

Kindly take the same on your record and acknowledge the receipt of the same.

Thanking You,


Asit Dhankumar Javeri
(Acquirer/ Promoter- Group)

Date: 28th October, 2025
Place: Mumbai


Abhishek Asit Javeri
(Acquirer/ Promoter- Group)

Date: 28th October, 2025
Place: Mumbai

Enclosure:

1. Disclosure under Regulation 10(5) of SEBI (SAST) Regulations, 2011

Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Sadhana Nitro Chem Limited ISIN: INE888C01040 BSE Scrip Code: Scrip Code: 506642 NSE Symbol: SADHNANIQ
2.	Name of the acquirer(s)	1. Mr. Asit Dhankumar Javeri 2. Mr. Abhishek Asit Javeri
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its Promoters	Yes, Both Acquirers are part of the promoter group of the Target Company.
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397)
	b. Proposed date of acquisition	31 st October, 2025
	c. Number of shares to be acquired from each person mentioned in 4(a) above	A. 4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Asit Dhankumar Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd B. 4,38,88,500 equity shares are proposed to be acquired (by way of off-market purchase) by Mr. Abhishek Asit Javeri from Manekchand Panachand Trading Investment Co Pvt Ltd All parties are part of promotor group



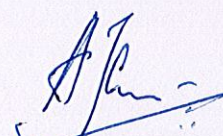
	d. Total shares to be acquired as % of share capital of TC	8,77,77,000 equity shares constituting 26.6469% of equity share capital of the Target Company.
	e. Price at which shares are proposed to be acquired	It is proposed to be acquired at Rs ₹6.17 per equity share pursuant to SEBI Regulation.
	f. Rationale, if any, for the proposed transfer	To hold the promoter shareholding in a tax efficient structure. Transfer of shares by way of sale.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open Offer	Regulation 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	Shares of the Target Company are traded on NSE and BSE both and are traded frequently Rs. 8.69 per share of face value of Re.1/- each on (NSE where the trading volume is more)
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Declaration is attached as ANNEXURE - A
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011	Declaration is attached as ANNEXURE - A



10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Declaration is attached as ANNEXURE - A			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total share capital of TC	No. of shares /voting rights	% w.r.t total share capital of TC
a	Acquirers and PACs (other than sellers)(*) 1. Mr. Asit Dhankumar Javeri 2. Mr. Abhishek Asit Javeri	4702226 2743762	1.4274 0.8329	48590726 46632262	14.7507 14.1562
b	Sellers Manekchand Panachand Trading Investment Co Pvt Ltd	87778021	26.6469	1021	0.0003

Note :

- (*) Shareholding of each entity shall be shown separately and then collectively in a group. The above disclosure shall be signed by the acquirer mentioning date & place.


Asit Dhankumar Javeri
(Acquirer/ Promoter- Group)

Date: 28th October, 2025
Place: Mumbai


Abhishek Asit Javeri
(Acquirer/ Promoter- Group)

Date: 28th October, 2025
Place: Mumbai

Annexure -A

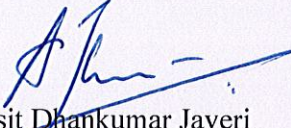
DECLARATION BY ACQUIRER

This is with respect to the following proposed acquisition of shares, being an inter-se transfer of shares amongst the Promoter and Promoter Group of the Target Company viz. Sadhana Nitro Chem Limited.


Inter-se Transfer of 8,77,77,000 (26.6469%) shares from Manekchand Panachand Trading Investment Co Pvt Ltd, Promoter of the TC to 1) Mr. Asit Dhankumar Javeri (4,38,88,500 shares) and 2) Mr. Abhishek Asit Javeri (4,38,88,500 shares), being Promoter/ Promoter Group in the shareholding pattern filed by the TC for not less than three years prior to the proposed acquisition.

In this regard, the undersigned being the proposed acquirer, hereby declare that:

- a. Acquisition price would not be higher by more than 25% of the price computed in point 6 of the declaration under regulation 10(5)
- b. The transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011
- c. All the conditions specified under regulation 10(1)(a) with respect to exemptions have been duly complied with.


Asit Dhankumar Javeri
(Acquirer/ Promoter)

Date: 28th October, 2025
Place: Mumbai


Abhishek Asit Javeri
(Acquirer/ Promoter - Group)

Date: 28th October, 2025
Place: Mumbai