

Asit D. Javeri

Ratnagar Palace,  
37, Chowpatty Sea Face  
Mumbai - 400 007.  
Res. Tel.: 2369 1818  
Off. Tel.: 022-6866 3300  
E-mail: Adj@sncl.com

**Date:** April 09, 2025

**To**  
**BSE Limited**  
1<sup>st</sup> 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, 2025, 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	11,07,68,332	33.63
Asit Javeri	Promoter	18,09,300	0.55
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	20,12,76,986	61.10
2.	Asit Javeri	Promoter	62,72,226	1.90
3.	Abhishek Asit Javeri	Promoter Group	27,43,672	0.83
4.	Chandrika Dhankumar Javeri	Promoter Group	10,20,279	0.31
5.	Sadhana Rajiv Jain	Promoter Group	10,20,279	0.31
6.	Anuradha Merchant	Promoter Group	6,48,625	0.20
7.	Seema Asit Javeri	Promoter Group	6,40,584	0.20
8.	Molina Dhankumar Javeri	Promoter Group	25,666	0.01
9.	Amita Vijayraj Parekh	Promoter Group	24,758	0.01
10.	Nisheeta Sanjay Agarawala	Promoter Group	-	-
11.	Rahat Sandeep Shah	Promoter Group	1,17,537	0.04
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	0.00
	<b>Total</b>		21,37,91,112	64.90

**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