

July 02, 2021

To,
BSE Limited,
1st Floor, P.J. Towers,
Dalal Street, Mumbai – 400001.

Scrip Code – 506642

Subject: Disclosure under regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Dear Sir/Madam,

I, Mr. Abhishek Asit Javeri, member of promoter group have been allotted 1,14,319 Equity Shares of Sadhana Nitro Chem Limited of Face value of Rs.10/- on March 28, 2018 issued on Sweat Equity Basis under lock in for a period of 3 years from the date of allotment i.e. March 28, 2018 has been release from lock in on May 31, 2021.

Please find enclosed disclosure of release of encumbrance as on May 31, 2021 in the prescribed format as required under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

Kindly take on record as enclosed below.

Thanking you,

Mr. Abhishek Asit Javeri
Director
DIN: 00273030

Encl. as above

Annexure I

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	Sadhana Nitro Chem Limited
Names of the Stock Exchanges where the shares of the target company are listed	BSE Limited
Date of reporting	July 02, 2021
Name of the promoter or PAC on whose shares encumbrance has been created /released/ invoked	Mr. Abhishek Asit Javeri
Details of the creation/invocation/release of encumbrance:	

Name of the promoter (s) or PACs with him*	Promoter holding in the target company (1)		Promoter holding already encumbered (2)		Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares {creation [(2)+(3)] / release [(2)-(3)] / invocation n-[(1)-(3)]}	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation / release / invocation)	Date of creation / release / invocation of encumbrance	Type of encumbrance (pledge / lien / non disposal / undertaking / others)	Reasons for encumbrance **	Number	% of share capital	Name of the entity in whose favor shares encumbered ***	Number	% of total share capital
Mr. Abhishek Asit Javeri	42,16,260	3.02 %	17,14,785	1.23%	Release	May 31, 2021	Others - Lock in	Pursuant to statutory requirement post Sweat equity allotment	*17,14,785	1.23%	NA	0	0

*

Sr. No	Corporate Action	Date	No. of Shares in lock- in
1	Issue of Sweat Equity shares	28 March 2018	1,14,319
2	Stock Split from Rs.10/- to Rs.5/-	29 Jan 2019	2,28,638
3	Stock Split from Rs.5/- to Rs.1/-	03 Apr 2020	11,43,190
4	Bonus issue 1:2	17 Sep 2020	Pre Bonus - 11,43,190 Post Bonus – 5,71,595 Total - 17,14,785

Note: Pursuant to above corporate Actions, number of shares to be released from lock in is 17,14,785

Mr. Abhishek Asit Javeri
Director
DIN: 00273030