Date: 27 November, 2025

To,

The Securities and Exchange Board of India
SEBI Bhawan, Plot no. C4-A, G Block
Bandra Kurla Complex, Bandra (East),
Mumbai – 400051

Subject: Report under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sir/Madam,

Please find attached herewith the Report as required under Regulation 10(7) read with Regulation 10(1)(a)(iii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 "Takeover Regulations" in respect of acquisition of shares, by way of inter-se transfer of shares among promoter/promoter group of Sadhana Nitro Chem Limited.

The respective intimations and reports as required under Regulation 10(5) and 10(6) of Takeover Regulations has already been submitted with National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) and the Target Company on 28th October, 2025 and 29th October, 2025 respectively.

Further in pursuant to SEBI Circular read with Regulation 10(7) of Takeover Regulations, the details of payment for the applicable fees made to Securities and Exchange Board of India at its Bank Account No. BDSKBEF7R3T13D7RP3 maintained with Citibank, D.N. Road, Fort, Mumbai, having IFSC code CITI0100000 are as:

Date of Payment	27-November-2025
Amount in Rupees	1,77,000 (inclusive of GST)
Purpose for payment of fees	For Submission of Report under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
NEFT(UTR No.)	ICICN42025112758986082 for Rs. 177005.90 dt. 27-11-2025

… 2

SADHANA NITRO CHEM LIMITED

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

Thanking you,

Yours faithfully,
For Sadhana Nitro Chem Limited

ASIT
DHANKUMAR
JAVERI

Digitally signed by ASIT DHANKUMAR JAVERI
DN: c=IN, o=Personal,
pseudonym=A43C05793CD8E956A9DF5A2EF8EAC727,
2.5.4.20=2303d76cd7e73d64930f00f15d1fee8bc58c22b3ad526940602571fab3a3e65f, postalCode=400007, st=Maharashtra,
serialNumber=1C1311BCC6086A5B4EB8FCAF3336B57B1023FBE88ED3C779A33672FDB69366A7, cn=ASIT DHANKUMAR JAVERI
Date: 2025.11.27 17:31:21 +05'30'

Asit Dhankumar Javeri
Managing Director

Encl. Disclosure under 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

CC: 1. **BSE Limited**
The Corporate Services Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai 400 001

2. **National Stock Exchange of India Limited**
Exchange Plaza, Bandra Kurla Complex
Bandra (E), Mumbai-400051

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

sadhananitro@sncl.com | www.sncl.com | CIN : L24110MH1973PLC016698 | Tel.: +912268663300

Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(iii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	**General Details**		
	a.	Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	**Name: a) Asit Dhankumar Javeri,** **Address: Ratnagar Palace, 37 Chowpatty Seaface, Mumbai-400007, India** **Tel: 9821010558** **E-mail: adj@sncl.com** **Name: b)Abhishek Asit Javeri,** **Address: Ratnagar Palace, 37 Chowpatty Seaface, Mumbai-400007, India** **Tel: 9820328269** **E-mail: abhishekjaveri@sncl.com**
	b.	Whether sender is the acquirer (Y/N)	**Y**
	c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	**Not Applicable**
	d.	Name, address, Tel no. and e-mail of sender, if sender is not the acquirer	**Not Applicable**
2	**Compliance of Regulation 10(7)**		
	a.	Date of report	**26th November, 2025**
	b.	Whether report has been submitted to SEBI within 21 working days from the date of the Acquisition	**Yes.**
	c.	Whether the report is accompanied with fees as required under Regulation 10(7)	**Yes, Rs.1,77,000 (Rs.1,50,000 + Rs.27,000 (18% GST) paid on 27.11.2025 through ICICI BANK NEFT UTR No. ICICN42025112758986082.**
3	**Compliance of Regulation 10(5)**		
	a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed, at least 4 working days before the date of the proposed acquisition.	**Yes.**
	b.	Date of Report	**28th October, 2025**

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeover Regulations, 2011)

4	**Compliance of Regulation 10(6)**					
	a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition	**Yes.**			
	b.	Date of Report	**29th October, 2025**			
	Details of the Target Company					
	a.	Name & address of TC	Sadhana Nitro Chem Limited, Nanavati Mahalaya, 18 Homi Mody Street, Fort, Mumbai 400001			
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	**BSE Scrip Code:** Scrip Code: 506642 **NSE Symbol:** SADHNANIQ			
6	**Details of the acquisition**					
	a.	Date of acquisition	A) Asit Dhankumar Javeri -07th November, 2025 B) Abhishek Asit Javeri – 07th November, 2025 & 14th November, 2025			
	b.	Acquisition price per share (in Rs.)	Rs. 6.17/- per share			
	c.	Regulation which would have been triggered off, had the report not been filed under Regulation 10(7)(whether Regulation 3(1), 3(2),4 or 5)	Regulation 3(2) of SEBI SAST Regulations.			
	d.	Shareholding of acquirer/s and PACs individually in TC (in terms of no: & as a percentage of the total share/voting capital of the TC)(*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital /voting rights of TC	No. of Shares	% w.r.t total share capital /voting rights of TC
		Name(s) of the acquirer(s)(**) 1. Mr. Asit Dhankumar Javeri - Promoter 2. Mr. Abhishek Asit Javeri – Promoter Group	. 4702226 2743762	1.4274 0.8329	48590726 46632262	14.7507 14.1562
	e.	Shareholding of seller/s in TC (in terms of no: & as a percentage of the total share/voting capital of the TC) (*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital /voting rights of TC	No. of Shares	% w.r.t total share capital /voting rights of TC
		Name(s) of the seller(s) (**) Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397)	87778021	26.6469	1021	0.0003

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeover Regulations, 2011)

7	**Information specific to the exemption category to which the instant acquisition belongs - Regulation 10(1)(a)(iii)**		
	a.	Provide the names of the seller/s	Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397) -- Promoter
	b.	Specify the relationship between the acquirer/s and the seller/s.	Belongs to Promoter Group
	c.	Confirm that the acquirer and the seller/s satisfy such a relationship as defined in Regulation 10(1)(a)(iii) of the Takeover Regulations	1) Manekchand Panachand Trading Investment Co Pvt Ltd (CIN: U67120MH1985PTC037397) -- Promoter Since 16th February, 2023 2) Mr. Asit Dhankumar Javeri 3. Mr. Abhishek Asit Javeri All the above three are part of Promoter Group over 03 Years.
	d.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Shares of the Company are frequently traded and the volume-weighted average market price (VWAP) of the shares of the Company for a period of sixty trading days preceding the date of issuance of Notice regarding the proposed acquisition to the Stock Exchanges is Rs. 8.69/- (Rupees Eight and Sixty Nine Paise) only.
	e.	If shares of the TC are infrequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable.
	f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above as applicable.	Yes
	g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	04th September, 2025 and revised on 28th October, 2025

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeover Regulations, 2011)

	h.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation/s as well as date on which the requisite disclosures were made along with the copies of the same.	Yes. Transaction is exempt under Regulation10(1). Requisite Disclosure was made under Regulation 10(5) on 28.10.2025 and under Regulation 10(6) on 29.10.2025 and copies of the same are enclosed.
	i.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(iii) with respect to exemptions has been duly complied with.	We the acquirer declare that all the conditions specified under regulation 10(1)(a)(iii) with respect to exemptions has been duly complied with.

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.

ASIT DHANKUMAR JAVERI

Digitally signed by ASIT DHANKUMAR JAVERI
DN: c=IN, o=Personal, pseudonym=A43C05793CD8E956A9DF5A2EF8EAC727, 2.5.4.20=2303d76cd7e73d64930f00f15d1fee8bc58c22b3ad526940602571fab3a3e65f, postalCode=400007, st=Maharashtra, serialNumber=1C1311BCC6086A5B4EB8FCAF3336B57B1023FBE88ED3C779A33672FDB69366A7, cn=ASIT DHANKUMAR JAVERI
Date: 2025.11.27 17:32:04 +05'30'

Asit Dhankumar Javeri
(Acquirer/ Promoter- Group)

Date: 27th November, 2025
Place: Mumbai

Abhishek Asit Javeri

Digitally signed by Abhishek Asit Javeri
DN: c=IN, o=Personal, title=7836, pseudonym=b84e2914757f4f13aa40e7bafbda1ac6, 2.5.4.20=34f8317d40e384ecf23f1203e3c4b38851b050c13f8f8cd6a46c8badd06a8f95, postalCode=400007, st=Maharashtra, serialNumber=0cd6d4315bfb273a7bd099c0e4664093fafa4a53dc7a193c10169cf1cfc09bfb, cn=Abhishek Asit Javeri
Date: 2025.11.27 17:32:52 +05'30'

Abhishek Asit Javeri
(Acquirer/ Promoter- Group)

Date:27thNovember, 2025
Place: Mumbai

NOTE:

(*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately.

(**) Shareholding of each entity shall be shown separately as well as collectively.

Securities and Exchange Board of India SEBI

(Scan QR Code with QR Reader to know the transaction status)

NEFT/RTGS Detail

Beneficiary Name:	**Securities and Exchange Board of India SEBI Online EFT**
NEFT/RTGS Amount:	**177005.90** (Do not round off amount)
Beneficiary A/C No:	**BDSKBEF7R3T13D7RP3** (Applicable only for this transaction. Above characters are a combination of alphabets and numbers. Carefully enter exactly as printed above)
Beneficiary IFSC:	**CITI0100000** (5th character is zero)
Beneficiary Bank:	**CITIBANK** D.N. Road, Fort, Mumbai

Challan Details

Challan Creation Date: 27/11/2025 Recommended transfer within: 2 days of challan creation

I/We (sender) have read, understood and accepted the following terms & conditions:

1.I/We will execute NEFT/RTGS from my/our bank within 2 days of creating this slip, post which funds may be refunded and required service may not be rendered.

2.Beneficiary Account Number mentioned in this Challan slip is applicable for current transaction only.For any other or new transaction, kindly initiate a new transaction workflow from merchant's website only.

3.**NEFT/RTGS should be initiated by using person to person bank account transfer only [R41 mode only].**In case you are requesting your bank branch to initiate NEFT/RTGS on your behalf,it must be specifically using R41 mode only.Using any other mode for transfer of funds will be treated as invalid and required services will not be rendered.

4.NEFT/RTGS transfer amount should be an exact match with transaction amount mentioned on this slip (including paisa).Do not round off the transfer amount even for the second decimal place.

5.I/We will not initiate multiple NEFT/RTGS by breaking the amount in more than one part. Such EFTs will be treated as invalid transactions and required service will not be delivered.

6.NEFT/RTGS should be initiated from the sender's bank account only as any refund/reversal will be credited in the same bank account.

7.It is sender's responsibility to ensure that the bank account is enabled for incoming NEFT/RTGS in case of refunds.

8.A nominal amount may be charged to the sender towards refund processing for invalid transactions Refunds.