

SADHANA NITRO CHEM LIMITED CIN : L24110MH1973PLC016698 Registered Office : Hira Baug, 1st Floor, Kasturba Chowk (C. P. Tank), Mumbai - 400 004, INDIA Tel.: 022-23865629 / 23875630 • Fax : 022-23887235

E-mail : sadhananitro@sncl.com • Website : www.sncl.com

Date: May 11, 2020

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

Scrip Code: 506642

Subject: Certificate under Regulation 40 (9) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 for year ended on 31st March, 2020.

Dear Sir,

With reference to Regulation 40 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Please find enclosed herewith a Certificate issued by the Practicing Company Secretary for the period from 1st October, 2019 to 31st March, 2020.

Kindly take note that due to the ongoing Coronavirus Pandemic, we are faced with restriction with regards to free movement. Also, due to non-availability of required resources such as printers and scanners at our home, we are unable to sign and submit the aforementioned disclosure.

Kindly take the same on your records.

FOR SADHANA NITRO CHEM LIMITED

SD /-

Nitin Rameshchandra Jani Company Secretary & Compliance Officer Membership No.: A4757 Address: - Plot No. 177, Room No.16, Jawahar Nagar Road No.2, Goregaon (West) Mumbai - 400062



Rozy Empire, Silvassa Road, Opp.: PWD Rest House, Vapi - 396 191, Tele Fax: (0260) 2431655 9324545141, Email : jppvapi13@csjpc.in

Date - 02/05/2020

To, The Board of Directors, Sadhana Nitro Chem Limited Hira Baug, 1st Floor, Kasturba Chowk (C.P.Tank), Mumbai - 400004.

Dear Sirs,

Sub: - <u>Certificate under Regulation 40 (9)</u> Of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

We have examined the data produced before us by E-mail (the relevant books, registers, forms, documents and papers could not be made available due to COVID-19 pandemic) relating to Sadhana Nitro Chem Limited ("the Company") maintained by Link Intime India Private Limited (Registrar & Share Transfer Agent) pertaining to transfer of equity shares of the Company for the period from 1st October, 2019 to 31st March, 2020 for the purpose of issuing a Certificate as per Certificate under Regulation 40 (9) Of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 entered into by, Sadhana Nitro Chem Limited with BSE Limited and based on the information provided by the Company and the Registrar & Share Transfer Agent, we hereby certify that the Company has issued during the half year ended 31st March, 2020.

- A) Share Certificate(s) relating to the transfer of Shares received during the period from 1st October, 2019 to 31st March, 2020 as entered in the Memorandum of Transfers have been issued within fifteen days of the date of lodgment for transfer, sub-division, consolidation, renewal, exchange from respective date of lodgment of each deed excepting those rejected on technical grounds. (As per Annexure "A")
- B) Share Certificates in respect of requests for issue of transmission certificates have been issued within / after 21 days of lodgment. (As per Annexure "A")

FOR JAGDISH PATEL & CO. Unique Code No.: P1991GJ052300 Company Secretaries,

Partner CS Ronak Kalathiya UDIN: A037007B000196199 Encl.: Annexure – 'A'



202, Prem Kutir CHS Ltd. Prem Nagar, Near MCF Udyan, Borivali (W)Mumbai 400091 Tel: (022) 2894 0483, 3067 5215



<u>ANNEXURE – "A"</u>

DETAILS FOR THE PERIOD 1st October, 2019 to 31st March, 2020

Sadhana Nitro Chem Limited

TOTAL NO. OF TRANSFERS/DELETION DEED RECEIVED.	TOTAL NO. OF TRANSFER/DELETION FOR WHICH CERTIFICATES WERE DISPATCHED.		
	WITHIN 15 DAYS FROM DATE OF RECEIPT	AFTER 15 DAYS FROM DATE OF RECEIPT	PENDING AS ON 31.03.2020
4	4	0	0

TOTAL NO. TRANSMISSION REQUEST RECEIVED.	TOTAL NO. OF TRANSMISSION CERTIFICATES DISPATCHED.	
	WITHIN 21 DAYS FROM DATE OF RECEIPT	AFTER 21 DAYS FROM DATE OF RECEIPT
14	13	1

FOR JAGDISH PATEL & CO. Unique Code No.: P1991 Company Secretaries, 8 Ro ACS 37007 CP 18350

Partner CS Ronak Kalathiya UDIN: A037007B000196199 Date : 02/05/2020