



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: June 29, 2022

To
The Secretary,
Listing Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Scrip Code: 506642

Sub: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015

Re: Violation of Company's Code of Conduct framed under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Ma'am,

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (**"the SEBI Regulations"**), Company's Code of Conduct formed under the SEBI Regulations and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violations of the Code of Conduct by the designated persons along with the action taken by the Company thereon is enclosed as **"Annexure A"** to this letter.

Yours faithfully,

FOR SADHANA NITROCHEM LIMITED

Abhishek A. Javeri
Managing Director
DIN: 00273030



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Annexure A

Report by Sadhana Nitro Chem Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider trading) Regulations, 2015

Sr. No.	Particulars	Details
1.	Name of the listed Company/ Intermediary/ Fiduciary	Sadhana Nitro Chem Limited
2.	<i>Please tick appropriate Checkbox.</i> Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the Designated Person (DP)	Mr. Dipak Patil
	ii. PAN of the DP	AXKPP4924F
	iii. Designation of DP	Shift Incharge
	iv. Functional Role of DP	Production Department
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	SADHNANIQ BSECODE: 506642
	ii. No of shares traded and value(Rs.) (Date- wise)	Selling of 10 shares during trading window closure on January 19, 2022 @ Rs.105.62 aggregating to Rs. 1056.20 Contra trade (Reverse buy)of 3 equity shares on February 25, 2022 @ Rs.133.45per share, aggregating to Rs.400.35 Contra trade (Reverse Sell) and Trade during the Trading Window closure of 1 equity shares on April 08, 2022 @ Rs.135.10per share, aggregating

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Factory : 47, MIDC, Roha - 402 116, Dist. Raigad, Maharashtra. Tel.: Dhatav-02194-236801/02/03, 263525



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		to Rs.135.10 Contra trade (Reverse Sell) and Trade during the Trading Window closure of 2 equity shares on April 29, 2022 @ Rs.125.10per share, aggregating to Rs. 250.20
D. In case value of trade(s) is more than Rs.10 lakhs in a calendar quarter		
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A.
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A.
4.	Details of violations observed under Code of Conduct	Trading during the period when the trading window was closed and indulged in contra trade.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	The non-compliance with the code of conduct was reviewed by the Audit Committee of the Company. Pursuant to which strict warning letter has been issued to the DP.
6.	Reasons recorded in writing for taking action stated above	It was noted that the violation made of code of conduct was inadvertent without any malafide intention. However, it was felt that the actions taken would be an appropriate measure to rectify to full extent the violation of the Code committed by the DP. The Company also believed that such action will serve to discourage any future instances of violation by any Designated Person or their relatives as well.
7.	Details of previous instances of violations, if any, since last financial year	N.A.
8.	If any amount collected for Code of Conduct violation(s):	As the total value of trade does not exceed the limit of Rs. 10,00,000, hence no penalty has been levied.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	-

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<p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Name of the transferor</td><td></td></tr><tr><td>Bank Name, branch and Account number</td><td></td></tr><tr><td>UTR/Transaction ReferenceNumber</td><td></td></tr><tr><td>Transaction date</td><td></td></tr><tr><td>Transaction Amount (in Rs.)</td><td></td></tr></tbody></table> <p>In case of Demand Draft (DD):</p> <table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Bank Name and branch</td><td></td></tr><tr><td>DD Number</td><td></td></tr><tr><td>DD date</td><td></td></tr><tr><td>DD Amount (in Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction ReferenceNumber		Transaction date		Transaction Amount (in Rs.)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD Amount (in Rs.)		N.A.
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9. Any other relevant information	N.A.																						

Yours faithfully,

FOR SADHANA NITROCHEM LIMITED

Abhishek A. Javeri
Managing Director
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