

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: March 11, 2022

To, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001

Scrip Code: 506642

Dear Sir/Madam,

<u>Subject: Intimation to Shareholders holding shares in physical mode in accordance</u> with SEBI Circular dated November 03, 2021 read with Circular dated December 14, 2021 – Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations').

Dear Sir/Ma'am,

Pursuant to Regulation 30 and Part A of Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith a copy of the letter being sent to the shareholders holding shares in physical mode in compliance with the SEBI Circular No. SEBI/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 3, 2021.

The Company has informed the physical shareholders to furnish their Valid PAN, KYC and Nomination details to the Registrars and Transfer Agent of the Company i.e. Link Intime India Private Limited.

Request you to take the above on record.

Thanking you

FOR SADHANA NITROCHEM LIMITED

NITIN	Digitally signed by NITIN RAMESHCHANDRA JANI DN: c=IN, o=Personal, postalCode=400104, st=Maharashtra,
RAMESHCH	2.5.4.20=845acf573bc16165491baaf66c1f4a9d 7bcf9a20f14a9710278e0dd635f2c1a, pseudonym=554ECCC5C56CF5A931F116BE18 8899C3386859EC,
ANDRA JANI	serialNumber=003CE4275A32F8278907DB722 80E22FC49A292317AD278150204447608SDC7 00, cn=NITIN RAMESHCHANDRA JANI Date: 2022.03.11 20:56:47 +05'30'

Nitin Rameshchandra Jani Company Secretary & Compliance Officer Membership No.: A4757

KYC FORM

То,	Date: / /
Link Intime India Private Limited.	Folio No:
C 101, 247 Park, L.B.S.Marg, Vikhroli (West), Mumbai - 400083.	No. of Shares:
Unit : <i>[COMPANY NAME]</i>	Serial No:
	Status:

Dear Sir/Madam,

I/We, refer to the current status of the above-mentioned folio as provided by you in the following table:

Name of the Security holder(s)	PAN (A)	Specimen Signature (B)	Email ID (C)	Mobile No. (D)	Nominee Details (E)

Bank Details :

Name of the Bank	
Bank Account Number	*** Mask if Present Else Required
IFSC	MICR No :

I/We, are enclosing herewith Investor Service Request Form ISR-1 along with the required supporting KYC documents for updation. Signature(s) :

First Holder	Joint Holder -1	Joint Holder -2	Joint Holder -3

Barcode (Normal/Speed)	Postal No :	Serial No :
TTL + Name of the Holder		
	_ (Address 1)	
	_ (Address 2)	
	_ (Address 3)	
	_ (Address 4)	
City PIN		
Unit Name :		Print Date :



Dear Investor,

Subject: -Request for Updating the KYC details as per SEBI Circular No.SEBI/HO/MIRSD/MIRSD RTAMB/P/CIR/2021/655 dated 3rd Nov 2021.

We refer to the above circular issued by SEBI that mandates all the listed companies to record the **PAN**, **Address with PIN code**, **Email address**, **Mobile Number**, **Bank Account details**, **Specimen Signature and Nomination by holders of physical securities**. This is applicable for all the security holders in physical mode.

The salient features and requirements of the circular are as follows:

A) <u>Non – updation of KYC - Folios</u>: wherein any ONE of the cited details/documents, (i.e PAN, Address with PIN code, Email address, Mobile Number, Bank Account details, Specimen Signature and Nomination) are not available on or after April 01, 2023, shall be frozen as per SEBI circular.

Notes:

1) The securities in the frozen folios shall be:

- Eligible to lodge any grievance or avail service request from the RTA only after furnishing the complete documents / details as aforesaid.
- Eligible for any payment including dividend, interest or redemption payment only through electronic mode upon complying with the above stated requirements.
- 2) a) The relevant formats for Nomination and Updation of KYC details viz; Forms ISR-1, ISR-2, ISR-3, SH-13, SH-14 and SEBI circular are available on our website as mentioned below;
 - **https://www.linkintime.co.in** \rightarrow Resources \rightarrow Downloads \rightarrow General \rightarrow Formats for KYC.
 - b) Original cancelled cheque leaf bearing the name of the first holder failing which first security holder is required to submit copy of bank passbook / statement attested by the bank which is mandatory for registering the new bank details.
- B) Mandatory Linkage of PAN with Aadhaar As per the Central Board of Direct Taxes (CBDT) it is mandatory to link PAN with Aadhaar number by March 31,2022. Security holders who are yet to link the PAN with Aadhaar number are requested to get the same done before March 31, 2022. Post March 31, 2022 or any other date as may be specified by the CBDT, RTAs shall accept only valid PANs and the ones which are linked to the Aadhaar number. The folios in which PAN is / are not valid as on the notified cut-off date of March, 31, 2022 or any other date as may be specified by the CBDT, shall also be frozen.
 - **Note:** Security holders from Sikkim can provide self-attested copy of Aadhaar Card/Voter's Card/Driving License/Passport or any other identity proof as issued by the Govt.

In view of the above, we request you to submit the KYC Form printed on the reverse of this letter, duly completed along with Investor Service Request Form ISR-1 and the required supporting documents as stated in Form ISR-1 at the earliest.

You may use any ONE of the following modes for submission:

- 1. In Person Verification (IPV): by producing the originals to the authorised person of the RTA, who will retain copy(ies) of the document(s).
- 2. In hard copy: by furnishing self-attested photocopy(ies) of the relevant document, with date.
- 3. With e-sign:
 - (a) In case your email is already registered with us, you may send the scanned copies of your KYC documents with e-sign at our dedicated email-id: kyc@linkintime.co.in Kindly mention the email subject line as "KYC Updation - (Company Name) - Folio No :______"
 - (b) Investors can also upload KYC documents with **e-sign** on our website **https://www.linkintime.co.in** \rightarrow Investor Services \rightarrow KYC Compliance.

E-Sign is an integrated service which facilitates issuing a Digital Signature Certificate and performing signing of requested data by e-sign user. You may approach any of the empanelled e-sign service providers available on https://cca.gov.in/ for the purpose of obtaining e-sign.

Yours faithfully,

For Link Intime India Pvt. Ltd Investor Relation Cell (IRC)

Form ISR – 1

(-SEBI circular No. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 03, 2021 on Common and Simplified Norms for processing investor's service request by RTAs and norms for furnishing PAN, KYC details and Nomination)

REQUEST FOR REGISTERING PAN, KYC DETAILS OR CHANGES / UPDATION THEREOF

[For Securities (Shares / Debentures / Bonds, etc.) of listed companies held in physical form]

A. I / We, request you to Register / Change / Update the following (Tick ✓ relevant box)

Date : / /

D PAN	□ Signature	Mobile Number
Bank details	Registered Address	E-mail address

B. Security and KYC Details [to be filled in by the First Holder]

Name of the Issuer Company	Folio No(s)		
Face value of Securities		Number of Securities	
Distinctive number of	From	From To	
Securities (Optional)			
E-mail Address			
Mobile Number			

C. I/We are submitting documents as per Table below (tick ✓ as relevant, refer to the instructions):

Name(s) of the Security holder(s) in Capital as per PAN	PAN	PAN Linked to
Copies of PAN of all the Holder(s) duly self-attested with date to be enclosed with this Form.		Aadhaar -Y/N
		Tick any one [✓] *
1.		Yes / No
2.		Yes / No
3.		Yes / No
4.		Yes / No

Note: * PAN shall be valid only if it is linked to Aadhaar by March 31, 2022, or any other date as may be specified by CBDT. To know the status of your Pan Linked to Aadhaar check on this link: https://www.incometax.gov.in/iec/foportal

Bank Account Details of First Holder			
Name of the Bank & Branch		IFSC	
Bank A/c No. Tick any one [/]- Acct type Savings Current D NRO NRE Any other []			
Note: Original cancelled cheque leaf bearing the name of the first holder is mandatory, failing which first security holder shall submit copy of bank			

Note: Original cancelled cheque leaf bearing the name of the first holder is mandatory, failing which first security holder shall submit copy of bank passbook / statement attested by the Bank for registering the Bank Account details.

Demat Account Number	16 digit DP/CL []
Also provide Client Master List (CM	L) of your Demat Account, provided by the Depository Participant.	

Authorization: I / We authorise you (RTA) to update the above PAN and KYC details in my / our above folio(s) (use Separate Annexure if extra space is required) in which I / we are the holder(s). [strike off what is not applicable]

Declaration: All the above facts and documents enclosed are true and correct.

First Holder	Joint Holder - 1	Joint Holder - 2	Joint Holder - 3
Signature			
Name			
Address			
PIN			

Note: If the address mentioned above differs from the address registered with the Company, you are requested to record the new address by submitting the documents as specified in point (3) overleaf.

No.	~	Document/Information/Details	Instruction/Remark			
1		PAN of (all) the (joint) holder(s)	PAN copies of all the holder(s) duly self-attested with date to be enclosed. PAN shall be valid only if it is linked to Aadhaar by March 31, 2022, or any date as may be specified by the CBDT. For Exemptions / Clarifications on PAN, please refer to Objection Memo as specified in SEBI circular.			
2		Demat Account Number	Provide Client Master List (CML) of your Demat Account, provided by the Depository Participant.			
3		Proof of Address of the first Holder	 Provide self attested copy of any ONE of the documents, issued by a Govt. Authority, only if there is change in the address; Client Master List (CML) of your Demat Account, provided by the Depository Participant. Valid Passport/ Registered Lease or Sale Agreement of Residence/Driving License/Flat Maintenance Bill* Utility bills like Telephone Bill (only land line), Electricity bill or Gas bill - Not more than 3 months old. Identity card (with Photo) / document with address, issued by Central/State Government and its Departments, Statutory / Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions. For FII / sub account, Power of Attorney given by FII / sub-account to the Custodians (which are duly notarized and / or apostilled or consularised) that gives the registered address should be taken. The proof of address in the name of the spouse* * Kindly provide additional self-attested copy of Identity Proof of the holder/claimant. 			
4		Bank details	Provide the latest copy of the bank statement with details of bank name, branch, account number and IFSC or Original cancelled cheque leaf bearing the name of first holder. Alternatively, Bank details available in the CML as enclosed will be updated in the folio.			
5		E-mail address	As mentioned on Form ISR-1, alternatively the E-mail address available in the CML as enclosed will be updated in the folio.			
6		Mobile	As mentioned on Form ISR-1, alternatively the mobile number available in the CML as enclosed will be updated in the folio.			
7		Specimen Signature	Provide banker's attestation of the signature of the holder(s) as per Form ISR – 2 and Original cancelled cheque leaf bearing the name of the first holder.			
8		Nomination	Submit Form(s) as per any ONE of the following options. SH-13 For First Time Nomination SH-14 For Change in Existing Nomination SH-14 and ISR-3 For Cancellation of existing Nomination and to "Opt-Out" ISR-3 To "OPT-Out" of Nomination or if No-Nomination is required			

Note: All the above forms are also available on our website..

Form ISR – 2

(SEBI circular No. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 03,2021)

Confirmation of Signature of Securities Holder by the Banker

_					_			
1. Bank Na	me and	d Branch			-			
2. Bank con	tact de	tails						
Postal Address								
Mobile/Tel number								
E-mail ac	ldress							
					-		0	0 00 0 0
3. Bank Acc	ount n	umber					allach ori	ginal cancelleð cheque lea
A Account								
4. Account	openin	g date						
5. Accoun	t holc	ler's PAI	N	Aco	count	Holder's Nam	ne	
i)				i)				
ii)				ii)				
iii)				iii)				
iv)				iv)	•			
6. Latest ph	otogra	ph of the	acco	unt holder(s	5)			
							1	
i)- Holder	Photo		ii)- H	Iolder Photo		iii)- Holder Photo		iv)- Holder Photo
7. Account	holder	(s) details	as pe	er Bank Reco	ords			
a) Address	;							
b) Mobile/	Tel nur	nber						
c) Email ac					•			
d) Signatur	e(s) o	f the Hold	ler(s))		1		
i) <u> </u>					-			
ii) 🖄					-			
iii) 🖄					_		. ~	
iv) 💉						1 Bank Manag 1	er's Dignalı	vre and Bank Seal
(To be Man	datoril	y Filled by	the	Bank Officia	I)			
Place:						ık Manager :		
Date:				Employee	Code :			
Mobile / Tel r	Mobile / Tel no:			Email id :				

Form ISR - 3

Declaration Form for Opting-out of Nomination

by Holders of Physical Securities in Listed Companies

(SEBI circular No. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 03, 2021)

Date: / /

Name of the Company :	
Address of the Company :	

PARTICULARS OF THE SECURITIES (in respect of which nomination is being opted out)

Nature of Securities Tick ✓ as relevant	Folio No. No. of Securities *		Certificate No.	Distinctive No(s) (From – To)		
Equity / Debentures						

I / We the holder(s) of the securities particulars of which are given hereinabove, *do not wish to nominate* any person(s) in whom shall vest, all the rights in respect of such securities in the event of my /our death.

I/ We understand the issues involved in non-appointment of nominee(s) and further are aware that in case of my / our death, my / our legal heir(s) / representative(s) are required to furnish the requisite documents / details, including, Will or documents issued by the Court like Decree or Succession Certificate or Letter of Administration / Probate of Will or any other document as may be prescribed by the competent authority, for claiming my / our aforesaid securities.

Signature(s) as per Specimen recorded with the Company.

First Holder	Joint Holder -1	Joint Holder -2	Joint Holder -3
Signature			
Name			

Witness Details:

To,

Name of Witness			
		Signature	
Address of Witness			
	Pin:	Date	

* Use of ISR-3 (ie to Opt-Out of Nomination OR if "No_Nomination" is required by the investor) will be applied for the entire securities against the said Folio.



Form No. SH-13

Nomination Form Pursuant to section 72 of the Companies Act, 2013 and rule 19(1) of the Companies (Share Capital and Debentures) Rules 2014] Date: / /

То,	
Name of the Company :	
Address of the Company:	

I/We, the holder(s) of the securities particulars of which are given hereunder, wish to make nomination and do hereby nominate the following persons in whom shall vest, all the rights in respect of such securities in the event of my/our death.

(1) PARTICULARS OF THE SECURITIES (in respect of which nomination is being made) :

Nature of Securities		Folio No.	No. of Securities*	Certific	ate No.	Distinctive No(s) (From – To)				
Tick ✓ as releva	nt							•		
Equity / Debs/ Bonds										
(2) PARTICULARS	S OF N	OMINEE/S — [Use	photocopies of this blank n	l omination form	in case of addit	I tional Multiple Nomin	ations in th	ne same	e folio]	
Name of Nomin	iee									
Address of Nom	ninee					Date of Birth	{	-	-	}
Father's/Mother's/ Spouse's name						Occupation				
Relationship wi			Nationality							
the security hol	der									
E-mail_id						Mobile No				
(3) IN CASE NOM	INEE IS	5 A MINOR —								
Name of Guardian						Date of Birth	{ -		-	}
Address of Guardian						Date of attaining majority	{	-	-	}
Signature(s) as per S	pecimen	recorded with the Con	npany.			•				
First Holder		Joint Holde	er -1	Joint	Holder -2	Joint Holder -3				
Signature										
Name										
Witness Details:							•			
Name of Witnes										

Name of Witness			
Address of Witness	 	Signature	
	·····	Date	

* Nomination will be registered for entire holding in the folio. In case of more than one nominee, the ratio should be furnished & separate form to be filled for each nominee.



Form No. SH-14

Cancellation or Variation of Nomination

[Pursuant to sub-section (3) of section 72 of the Companies Act, 2013 and rule 19(9) of the Companies

(Share Capital and Debentures) Rules 2014] To, Date: 1 1 Name of the Company : -----Address of the Company: -----I/We, hereby cancel the nomination(s) made by me/us in favour of.....(name and address of the nominee) in respect of the below mentioned securities. or I/We hereby nominate the following person in place ofas nominee in respect of the below mentioned securities in whom shall vest all rights in respect of such securities in the event of my/our death. (1) PARTICULARS OF THE SECURITIES (in respect of which nomination is being cancelled / varied): **Distinctive No(s) Nature of Securities** Folio No. No. of Securities* Certificate No. (From – To) Tick ✓ as relevant Equity / Debs/ Bonds (2) PARTICULARS OF THE NEW NOMINEE/S — [Use photocopies of this Form-SH-14 in case of additional Multiple New Nominations in the same folio] Name of Nominee **Address of Nominee Date of Birth** } { _ Father's/Mother's/ Occupation Spouse's name **Relationship with** Nationality the security holder E-mail_id Mobile No (3) IN CASE NEW NOMINEE IS A MINOR — Name of { Date of Birth } -Guardian Address of Date of attaining { } _ Guardian majority Signature(s) as per Specimen recorded with the Company. **First Holder** Joint Holder -1 Joint Holder -2 Joint Holder -3 Signature

Witness Details:

Name

Name of Witness			
Address of Witness	Pin	Signature	
WILLIC33	r	Date	

* New Nomination will be registered for entire holding in the folio. In case of more than one new-nominee, the ratio should be furnished & separate form to be filled for each of the new-nominee.



Confirmation of Signature of shareholder by the Banker with their official Rubber Stamp Giving the full address of the Bank and the Employee Code number of the official signing this form.

1.	Bank Name	:
2.	Bank Address	:
	Bank Phone No.	:
3.	Bank Account No	:
4.	Account Opening Da	e:
5.	Account Holder[s]	:
	Name	1)
		2)
		3)

6. Latest Photograph of the account holder[s]:

1 st Holder	2 nd Holder	3 rd Holder
------------------------	------------------------	------------------------

7. Account Holder[s] details as per Bank Records :

a) Address	:				
b) Phone No. c) Email ID.					
d) Signature[s]:					
1)	2)		3)		
Rubber Stamp of the B	ank	Signature Verit	fied as recorded with t	he Bank	
Place:		(Sign)			
		Name of Bank	Name of Bank Manager : Emp Code :		
Date:		Emp Code :			
		Email ID :			