

To,

**BSE Limited**

Corporate Relationship Dept.  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P. J. Tower,  
Dalal Street, Fort,  
Mumbai – 400 001  
Company Code: 520111

Listing Compliance Dept.

**National Stock Exchange of  
India Limited**

"Exchange Plaza", 5th Floor,  
Bandra – Kurla Complex,  
Bandra (E),  
Mumbai - 400 051  
Company Code : RATNAMANI

**Sub: Disclosure under Regulation 10(6) of Securities and Exchange Board of India  
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011:**

Dear Sir/Madam,


In order to comply with the provisions of Regulation 10(6) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulations, 2011"), as amended from time to time, we, Mahendra C Sanghvi (First Holder) jointly with Usha M Sanghvi (Second Holder) and Prakash M Sanghvi (Third Holder), the acquirers (Promoters), hereby furnish a disclosure in the specified format as per the said regulations, in respect of acquisition of 2,12,116 Equity Shares of Rs.2/- each (0.3026%) of the Target Company i.e. **Ratnamani Metals and Tubes Limited ("TC")**, by way of inter se transfer by Gift by the immediate relatives i.e. Arunaben C. Sanghvi (First Holder) and Prakash M Sanghvi (Second Holder), members of the Promoter and Promoter Group.

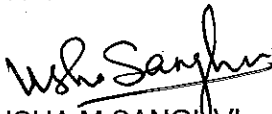
The said transfer falls under a list of exemptions provided in the SEBI SAST Regulations, 2011 specifically under Regulation 10(1)(a)(i) and (ii) which states that "acquisition by way of inter-se transfer by immediate relatives and who are also promoters for more than 3 years" is exempted for compliance with Regulation 3 & 4.


As per the provisions of the SEBI SAST Regulations, 2011, please take on record a disclosure made under Regulation 10(6), which is enclosed herewith.

We would further like to state and confirm that there has been no change in the consolidated total shareholding of the Promoter and Promoter Group in the TC due to the said Transfer (Gift).

Kindly take this information on your record.

  
MAHENDRA C SANGHVI  
(First Holder)

  
USHA M SANGHVI  
(Second Holder)

  
PRAKASH M SANGHVI  
(Third Holder)

Place: Ahmedabad

Date: 02-12-2024

CC to:

**The Compliance Officer**  
**Ratnamani Metals and Tubes Limited,**  
17<sup>th</sup> Rajmugat Society, Naranpura Cross Roads,  
Ahmedabad – 380013

**Format for Disclosures under Regulation 10(6) –Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	Ratnamani Metals and Tubes Limited	
2.	Name of the acquirer(s)	Mahendra C Sanghvi (First Holder) jointly with Usha M Sanghvi (Second Holder) and Prakash M Sanghvi (Third Holder)	
3.	Name of the stock exchange where shares of the TC are listed	BSE and NSE	
4.	Details of the transaction including rationale, if any, for the transfer / acquisition of shares.	Inter-se Transfer by way of Gift of 2,12,116 Equity Shares from immediate relative i.e. Arunaben C. Sanghvi (First Holder) and Prakash M. Sanghvi (Second Holder)	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10 (1) (a) (i) and (ii) – <i>Inter se</i> Transfer of Shares between “immediate relatives” who are also promoters for more than 3 years, without any consideration in the form of Gift.	
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so, - whether disclosure was made and whether it was made within the timeline specified in the regulations. - date of filing with the stock exchange	Yes, Prior intimation was submitted within the timeline specified under Regulation 10(5) of the SEBI (SAST) Regulations, 2011, on 25 <sup>th</sup> November 2024.	
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made
a.	Name of the transferor / seller	Yes Arunaben C. Sanghvi (First Holder) jointly with Prakash M. Sanghvi (Second Holder)	Yes, the required disclosure was made on 25 <sup>th</sup> November, 2024 regarding the proposed acquisition.
b.	Date of acquisition	02-12-2024	
c.	Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	2,12,116 Equity Shares	
d.	Total shares proposed to be acquired/ acquired as a % of diluted share capital of TC	2,12,116 Equity Shares constituting 0.302% of share capital of the TC was proposed to be acquired.	
e.	Price at which shares are proposed to be acquired/actually acquired	N.A. It is an off-market transfer by way of Gift between the Promoters (immediate relatives)	

8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
a	Acquirer/Transferee Mahendra C. Sanghvi (First Holder) & Usha M. Sanghvi (Second Holder) & Prakash M Sanghvi (Third Holder)	2,13,375	0.304%	4,25,491	0.607%
b	Seller/Transferor Arunaben C. Sanghvi (First Holder) & Prakash M. Sanghvi (Second Holder)	11,94,869	1.704%	8,41,343*	1.200%

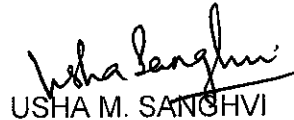
\*After adjusting the Gift of 1,41,410 Shares to Vijay C Sanghvi, for which separate disclosures are being filed.

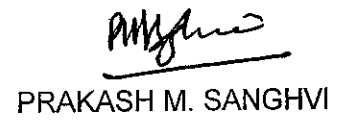
The Shareholding of Promoter and Promoter Group of the Target Company, pre and post Transmission is as follows:

Particulars	Details of Promoter and Promoters Group	
	Number of Shares	% of Shares
Prior to Transmission	4,18,95,320	59.7719
Post Transmission	4,18,95,320	59.7719

**SIGNED BY THE TRANSFEREES:**

  
MAHENDRA C. SANGHVI  
(First Holder)

  
USHA M. SANGHVI  
(Second Holder)

  
PRAKASH M. SANGHVI  
(Third Holder)

Place: Ahmedabad  
Date: 02-12-2024