



Gandhi Special Tubes Ltd.

Regd. Off.: 201-204, Plaza, 2nd Floor, 55 Hughes Road, Next to Dharam Palace, Mumbai - 400 007.

Tel.: 2363 4179 / 2363 4183 / 2363 5042 • Fax : 91-22-2363 4392

E-mail : info@gandhitubes.com • Website : www.gandhitubes.com

CIN.: L27104MH1985PLC036004 .



Ref No: GSTL/BSE/NSE/12026092

Date: 29/06/2021

The Secretary BSE Limited 1 st Floor Phiroze Jeejeebhoy Towers Dalal Street Mumbai-400 001 Scrip Code: 513108	The Manger The National Stock Exchange India Limited Exchange Plaza, Plot No. C/1, G Block Bandra Kurla Complex, Bandra (East), Mumbai-400051 Scrip Code: GANDHITUBE
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Sub: Annual Secretarial Compliance Report 2020-2021

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015 (Listing Regulations) read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the Financial Year 2020-2021.

Kindly take the same on records.

Thanking You

Yours Faithfully,

For Gandhi Special Tubes Limited,



Jitendra Khadye

Company Secretary & Compliance Officer

Encl.: a/a

Designated Partners

CS Bhumitra V. Dholakia

B.A., L.L.B., C.A.I.I.B., F.C.S.

CS Nrupang B. Dholakia

B.Com., F.C.S., M.B.L., L.L.B., D.C.L., EP.CORP

DHOLAKIA & ASSOCIATES LLP

(COMPANY SECRETARIES)

SECRETARIAL COMPLIANCE REPORT

OF

GANDHI SPECIAL TUBES LIMITED

(CIN: L27104MH1985PLC036004)

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

[Issued in Pursuance to Para 3(b) of circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 issued by the Securities and Exchange Board of India]

We have examined:

- (a) all the documents and records made available to us via electronic platform due to the ongoing pandemic and partial lockdown and explanation provided by Gandhi Special Tubes Limited (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

Regd Office: A/302, Sarvodaya CHSL, Bldg No. 11, Nr. P.F. Office, Khernagar, Bandra (E), Mumbai – 400051.

Tel No. +91 22 26580309, +91 22 26476280, +91 22 26471302. E-Mail: info@dholakia-associates.com.

Designated Partners

CS Bhumitra V. Dholakia

B.A., L.L.B., C.A.I.I.B., F.C.S.

CS Nrupang B. Dholakia

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The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(No Transactions during the Review Period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(No Transactions during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(No Transactions during the Review Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(No Transactions during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.
- (j) The Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations, 1993

and circulars/guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period: -

Designated Partners**CS Bhumitra V. Dholakia**

B.A., L.L.B., C.A.I.I.B., F.C.S.

CS Nrupang B. Dholakia

B.Com., F.C.S., M.B.L., L.L.B., D.C.L., EP.CORP

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- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except in respect of matters specified below:

Sr. No	Compliance (Regulations/ guidelines specific clause)	Requirement circulars / including	Deviations	Observations/ Remarks of the Practicing Company Secretary
	-----NOT APPLICABLE-----			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
	-----NOT APPLICABLE -----			

Designated Partners**CS Bhumitra V. Dholakia**

B.A., L.L.B., C.A.I.I.B., F.C.S.

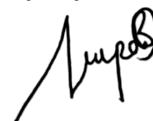
CS Nrupang B. Dholakia

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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports with respect to Compliance requirement	Observations made in the secretarial compliance report for the year ended 31st March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 7 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015	The Company erroneously did not include the data pertaining to two LLPs belonging to the group which had tendered its shares under the Buy-back offer announced by the Company during September 25, 2019 to October 10, 2019 while uploading the disclosure under Regulation 7 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 on the Stock Exchange Portal	At the time of signing the previous report i.e. 30.07.2020 the Company has submitted the required details to Exchange.	The Company has uploaded the details as required under 7 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 before issuing the previous year's report

Place: Mumbai**Date: June 22, 2021****UDIN: F010032C000499587****For DHOLAKIA & ASSOCIATES LLP****(Company Secretaries)****CS Nrupang B. Dholakia****Designated Partner****FCS 10032 CP 12884**

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