



Ambadi Investments Limited
Parry House, 5th floor,
43, Moore Street, Chennai 600 001, India
Tel: +91.44.25306789 , +91.44.25306741
CIN: U65993TN1942PLC003659

September 30, 2023

The Manager
Listing Department
National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor
Plot No.C-1, Block G
Bandra-Kurla Complex
Bandra (E)
Mumbai 400 051

BSE Limited
1st Floor
New Trading Ring, Rotunda
Building
P J Towers, Dalal Street
Fort, Mumbai 400 001

Dear Sir / Madam,

Sub: Declaration under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011


We, Ambadi Investments Limited, the undersigned, on behalf of the Promoter & Promoter Group of Tube Investments of India Limited, hereby inform you that we are making the filing required under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Please find attached necessary disclosures relating to disposal of equity shares of M/s. Tube Investments of India Limited under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 in the prescribed format.

Kindly take the same on your records.

Thanking you,

Yours faithfully,
For AMBADI INVESTMENTS LIMITED


M A ALAGAPPAN
CHAIRMAN

Encl.

Copy to:

The Board of Directors
M/s. Tube Investments of India Limited
"Chola Crest", No.C54-55 & Super B-4,
Thiru-Vi-Ka Industrial Estate, Guindy,
Chennai – 600032.

Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Part-A- Details of the Acquisition

Name of the Target Company (TC)	Tube Investments of India Limited (“ Target Company ”)		
Name(s) of the sellers	1. Ambadi Enterprises Limited (“AEL”) 2. Murugappa & Sons (“M&S”) (Part of the Promoter & Promoter Group of the Target Company as set out in Annexure A ^{\$})		
Whether the seller belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited and National Stock Exchange of India Limited		
Details of the acquisition / sale as follows	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition/sale under consideration, holding of:			
(a) Shares carrying voting rights [#]	8,91,43,647 (As set out in Annexure A)	46.11%	46.11%
(b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others) [#]	13,000	0.01%	0.01%
(c) Voting rights (VR) otherwise than by shares	NIL	NIL	NIL
(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	NIL	NIL	NIL
(e) Total (a+b+c+d) [#]	8,91,43,647	46.11%	46.11%
Details of acquisition/sale			
(a) Shares carrying voting rights acquired/sold	19,22,180 ^{&} (AEL – 10,58,200 MS – 8,63,980)	0.99% ^{&}	0.99% ^{&}

(b) VRs acquired/sold otherwise than by shares	NIL	NIL	NIL
(c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold converted into equity shares	NIL	NIL	NIL
(d) Shares encumbered /invoked / released by the acquirer	NIL	NIL	NIL
(e) Total (a+b+c+d)	19,22,180 ^{&}	0.99% ^{&}	0.99% ^{&}
After the acquisition/sale, holding of acquirer of:			
(a) Shares carrying voting rights [#]	8,72,21,467	45.12%	45.12%
(b) Shares encumbered with the acquirer/seller [#]	13,000	0.01%	0.01%
(c) VRs otherwise than by shares	NIL	NIL	NIL
(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	NIL	NIL	NIL
(e) Total (a+b+c+d) [#]	8,72,21,467	45.12%	45.12%
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc)	Open market sale		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	29th September 2023		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 19,33,18,815 comprising of 19,33,18,815 Equity Shares of Re.1 each		
Equity share capital/total voting capital of the TC after the said acquisition/sale	Rs. 19,33,18,815 comprising of 19,33,18,815 Equity Shares of Re.1 each		

Total diluted share/voting capital of the TC after the said acquisition/sale	Rs. 19,33,18,815 comprising of 19,33,18,815 Equity Shares of Re.1 each
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\$ Note: For the purpose of this sale and there are no Person Acting in Concert.

Note: Includes 13,000 shares representing 0.01% of the share capital of the Target Company pledged by the Promoter & Promoter Group as disclosed in the Annexure A.

& Note: Due to the preferential allotment by the Target Company on December 23, 2020, the total percentage shareholding of the Promoter and Promoter Group was diluted from 47.9% to 46.7%. There was no change in the actual number of shares held by the Promoter and Promoter Group. Therefore, as given in FAQ No. 73 under the FAQs on SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 issued by SEBI, no disclosure was made by the Promoter and Promoter Group. The present disclosure is being made as the cumulative sale of shares by the Promoter and Promoter Group exceeds two per cent of total shareholding in the Target Company with the aforesaid transaction (from the time of the previous disclosure).

On behalf of the Promoter & Promoter Group,
AMBADI INVESTMENTS LIMITED


M A ALAGAPPAN
CHAIRMAN

Place: Chennai

Date: September 30, 2023

Note:

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Annexure A

S. No.	Name of the shareholder	No. of shares	% w.r.t. total share/voting capital	% w.r.t. total diluted share/voting capital
1	M V Subbiah	1,35,000	0.07%	0.07%
2	M V Subbiah - as Kartha of M V Subbiah HUF	1,71,200	0.09%	0.09%
3	M V Seetha Subbiah	45,000	0.02%	0.02%
4	Valli Subbiah	-	-	-
5	M V Murugappan HUF (Kartha - Valli Arunachalam)	5,43,330	0.28%	0.28%
6	M Vellachi	5,97,425	0.31%	0.31%
7	Umayal.R.	2,26,580	0.12%	0.12%
8	S Vellayan	-	-	-
9	A Vellayan	3,82,400	0.20%	0.20%
10	A Vellayan - as Kartha of A Vellayan HUF	2,49,500	0.13%	0.13%
11	Lalitha Vellayan	-	-	-
12	Valli Annamalai	1,57,127	0.08%	0.08%
		(includes pledged shares - 7000)	0.005%	0.005%
13	V Narayanan	2,81,140	0.15%	0.15%
14	V Vasantha	2,300	0.00%	0.00%
15	V Arunachalam	3,38,990	0.18%	0.18%
16	A V Nagalakshmi	3,600	0.00%	0.00%
17	A Venkatachalam	5,13,610	0.27%	0.27%
18	A Venkatachalam - as Kartha of A Venkatachalam HUF	2,52,000	0.13%	0.13%
19	Meyyammai Venkatachalam	3,58,580	0.19%	0.19%
20	Arun Venkatachalam	1,98,130	0.10%	0.10%
21	M V A R Meenakshi	4,49,630	0.23%	0.23%
22	M M Murugappan	2,04,715	0.11%	0.11%
23	M M Murugappan - as Kartha of M M Muthiah HUF	2,77,360	0.14%	0.14%
24	M M Murugappan - as Kartha of M M Murugappan HUF	3,55,330	0.18%	0.18%
25	Meenakshi Murugappan	70	0.00%	0.00%
26	M M Seethalakshmi	-	-	-
27	Solachi Ramanathan	8,500	0.00%	0.00%
28	M M Venkatachalam	4,000	0.00%	0.00%
29	Lakshmi Venkatachalam	1,200	0.00%	0.00%
30	M.A.Alagappan	7,10,000*	0.37%	0.37%
		(includes pledged shares - 6000)	0.005%	0.005%
31	M A Alagappan - as Kartha of M A Alagappan HUF	1,30,660	0.07%	0.07%
32	Arun Alagappan	8,33,090	0.43%	0.43%
33	A.Keertika Unnamalai	500	0.00%	0.00%
34	Pranav Alagappan	25,950	0.01%	0.01%
35	M A M Arunachalam	4,70,160	0.24%	0.24%
36	M A M Arunachalam - as Kartha of M A M Arunachalam HUF	1,48,660	0.08%	0.08%
37	Sigapi Arunachalam	2,27,990	0.12%	0.12%
38	A M Meyyammai	9,31,500	0.48%	0.48%
39	Lakshmi Chockalingam	1,58,660	0.08%	0.08%
40	Dhruv M Arunachalam	11,000	0.01%	0.01%
41	M M Muthiah	-	-	-
42	Sivagami Natesan	-	-	-
43	Kanika Subbiah	-	-	-
44	Karthik Subbiah	-	-	-
45	Kabir Subbiah	-	-	-
46	Anannya Lalitha Arunachalam	-	-	-
47	M V Muthiah	-	-	-
48	Niranthara Alamelu Jawahar	-	-	-
49	M V Subramanian	-	-	-
50	M A Alagappan -as Kartha of AMM Arunachalam HUF	-	-	-
51	A A Alagammai	-	-	-
52	Lakshmi Ramaswamy	-	-	-
53	Valli Alagappan	1,000	0.00%	0.00%
54	Vedhika Meyyammai Arunachalam	-	-	-

S. No.	Name of the shareholder	No. of shares	% w.r.t. total share/voting capital	% w.r.t. total diluted share/voting capital
55	Uma Ramanathan	2,000	0.00%	0.00%
56	Bollampally Rishika Reddy	-	-	-
57	Ahana Lalitha Narayanan	-	-	-
58	Krishna Murugappan Muthiah	5,000	0.00%	0.00%
59	M M Venkatachalam - as Kartha of M M Venkatachalam HUF	-	-	-
60	Nila Lakshmi Muthiah	-	-	-
61	Ambadi Investments Limited	6,89,66,595	35.68%	35.68%
62	Ambadi Enterprises Limited	10,58,200	0.55%	0.55%
63	Carborundum Universal Limited	1,000	0.00%	0.00%
64	Murugappa Educational and Medical Foundation	7,26,200	0.38%	0.38%
65	M A Alagappan holdings Private Limited	4,46,360	0.23%	0.23%
66	A M M Vellayan Sons P Limited	38,430	0.02%	0.02%
67	M.M.Muthiah Sons Private Limited	4,200	0.00%	0.00%
68	M.M.Muthiah Research Foundation	2,80,920	0.15%	0.15%
69	M A Murugappan holdings LLP (Formerly, M A Murugappan holdings Private Ltd).	5,46,860	0.28%	0.28%
70	AR Lakshmi Achi Trust	3,91,510	0.20%	0.20%
71	Lakshmi Ramaswamy Family Trust (A A Alagammai & Lakshmi Ramaswamy holds shares on behalf of Trust)	6,89,998	0.36%	0.36%
72	M V Muthiah Family Trust (M M Venkatachalam & M V Muthiah holds shares on behalf of Trust)	4,59,830	0.24%	0.24%
73	M M Veerappan Family Trust (M M Murugappan & Meenkashi Murugappan holds shares on behalf of Trust)	4,68,055	0.24%	0.24%
74	M M Muthiah Family Trust (M M Murugappan & M M Muthiah holds shares on behalf of Trust)	4,78,055	0.25%	0.25%
75	M V Subramanian Family Trust (M M Venkatachalam & V Subramanian holds shares on behalf of Trust)	4,59,830	0.24%	0.24%
76	M M Murugappan Family Trust (M M Murugappan and Meenakshi Murugappan hold shares on behalf of Trust)	2,31,800	0.12%	0.12%
77	Meenakshi Murugappan Family Trust (M M Murugappan and Meenakshi Murugappan hold shares on behalf of Trust)	5,00,000	0.26%	0.26%
78	Lakshmi Venkatachalam Family Trust (M M Venkatachalam & Lakshmi Venkatachalam hold shares on behalf of Trust)	3,79,905	0.20%	0.20%
79	Shambho Trust (M V Subbiah and S Vellayan hold shares on behalf of Trust)	6,03,180	0.31%	0.31%
80	Saraswathi Trust (M V Subbiah, S Vellayan and M V Seetha Subbiah hold shares on behalf of Trust)	5,37,360	0.28%	0.28%
81	E.I.D.Parry (India) Limited	-	-	-
82	Parry America Inc	-	-	-
83	Parrys Investments Limited	-	-	-
84	Parry Infrastructure Company Private Limited	-	-	-
85	Parrys Sugar Limited	-	-	-
86	Parry Agrochem Exports Ltd	-	-	-
87	Coromandel International Ltd	-	-	-
88	Alimtec S.A.	-	-	-
89	Coromandel Chemicals Limited (Formerly, Parry Chemicals Limited)	-	-	-
90	Cfl Mauritius Limited	-	-	-
91	Coromandel Australia Pty Ltd (Formerly, Sabero Australia Pty Ltd)	-	-	-
92	Sabero Organics America Sa	-	-	-
93	Sabero Argentina Sa	-	-	-
94	Sabero Organics Philippines asia Inc.	-	-	-
95	Coromandel Agronegocios De Mexico S.A. De C.V.	-	-	-
96	Coromandel Brasil Ltda (Limited Liability Company)	-	-	-
97	Yanmar Coromandel Agrisolutions Private Limited	-	-	-
98	Tunisian Indian Fertilizer S.A., Tunisia	-	-	-
99	Foskor (Pty) Limited, South Africa	-	-	-
100	Us Nutraceuticals Llc	-	-	-
101	Parry Sugars Refinery India Private Limited	-	-	-
102	Algavista Greentech Private Limited	-	-	-

S. No.	Name of the shareholder	No. of shares	% w.r.t. total share/voting capital	% w.r.t. total diluted share/voting capital
103	La Bella Botanics Llc	-	-	-
104	Dare Ventures Limited (Formerly, Dare Investments Limited)	-	-	-
105	New Ambadi Estates Private Limited	-	-	-
106	Parry Enterprises India Limited	-	-	-
107	Parry Agro Industries Limited	-	-	-
108	Murugappa Management Services Private Limited (Formerly, Murugappa Management Services Limited)	-	-	-
109	Parry Murray Limited UK	-	-	-
110	Financiere C 10	-	-	-
111	Sedis, SAS	-	-	-
112	Sedis Company Limited	-	-	-
113	Sedis Gmbh	-	-	-
114	Great Cycles (Private) Limited	-	-	-
115	Creative Cycles (Private) Limited	-	-	-
116	Shanthi Gears Limited	-	-	-
117	Cholamandalam Securities Limited	-	-	-
118	Cholamandalam Home Finance Limited (Formerly Cholamandalam Distribution Services Limited)	-	-	-
119	Chola Insurance Distribution Services Private Limited (Formerly, Chola Insurance Services Private Limited)	-	-	-
120	Chola Business Services Limited	-	-	-
121	Cholamandalam Investment and Finance Company Limited	-	-	-
122	Kartik Investments Trust Limited	-	-	-
123	Cherrytin Online Private Limited	-	-	-
124	Cholamandalam Ms General Insurance Company Limited	-	-	-
125	Cholamandalam Ms Risk Services Limited	-	-	-
126	Chola People and Marketing Services Private Limited (Formerly,Chola People Services Private Limited)	-	-	-
127	Cholamandalam Financial holdings Limited (Formerly TI Financial holdings Limited & Tube Investments of India Limited)	-	-	-
128	Cumi America Inc.	-	-	-
129	Net Access (India) Limited	-	-	-
130	Southern Energy Development Corporation Limited	-	-	-
131	Sterling Abrasives Limited	-	-	-
132	Cumi (Australia) Pty Ltd	-	-	-
133	Cumi Middle East Fze	-	-	-
134	Cumi International Ltd	-	-	-
135	Volszhsky Abrasives Works	-	-	-
136	Foskor Zirconia Pty Limited, South Africa	-	-	-
137	Cumi Abrasives and Ceramics Company Ltd, China	-	-	-
138	Cumi Europe S.R.O	-	-	-
139	Wendt (India) Limited	-	-	-
140	Murugappa Morgan Thermal Ceramics Limited	-	-	-
141	Ciria India Limited	-	-	-
142	Coromandel Engineering Company Limited	-	-	-
143	Kadamane Estates Company	-	-	-
144	Yelnoorkhan Group Estates	-	-	-
145	Murugappa & Sons - M V Subbiah, M A Alagappan & M M Murugappan hold shares on behalf of firm	8,63,980	0.45%	0.45%
146	AMM Foundation	-	-	-
147	V S Bhairavi Trust (M V Subbiah & Vellayan Subbiah holds shares on behalf of Trust)	-	-	-
148	K S Shambhavi Trust (M V Subbiah & S Vellayan holds shares on behalf of Trust)	-	-	-
149	TI Absolute Concepts Private Limited	-	-	-
150	M M Venkatachalam Family Trust (M M Venkatachalam and Lakshmi Venkatachalam hold shares on behalf of Trust)	4,03,900	0.21%	0.21%
151	Coromandel International (Nigeria) Ltd	-	-	-
152	Parry International DMCC	-	-	-
153	Coromandel Mali Sasq, West Africa	-	-	-
154	C G Power and Industrial Solutions Limited	-	-	-
155	Pluss Advanced Technologies Private Limited	-	-	-

S. No.	Name of the shareholder	No. of shares	% w.r.t. total share/voting capital	% w.r.t. total diluted share/voting capital
156	Pluss Advanced Technologies B.V., Netherlands	-	-	-
157	Cumi Awuko Abrasives Gmbh (Formerly, Cumi Gmbh, Germany)	-	-	-
158	TI Clean Mobility Private Limited	-	-	-
159	Cellestial E-Mobility Private Limited	-	-	-
160	Cellestial E-Trac Private Limited	-	-	-
161	Payswiff Technologies Private Limited	-	-	-
162	Payswiff Solutions Private Limited	-	-	-
163	Payswiff Services Private Limited	-	-	-
164	Murugappa Water Technology and Solutions Private Limited (formerly known as Murugappa Organo Water Solutions Private Limited)	-	-	-
165	Payswiff PTE Limited, Singapore	-	-	-
166	Rhodium Abrasives Gmbh, Germany	-	-	-
167	M V Seetha Subbiah Benefit Trust (M V Subbiah & Subbiah Vellayan holds shares on behalf of Trust)	14,500	0.01%	0.01%
168	Valli Subbiah Benefit Trust (Subbiah Vellayan and M V Subbiah holds shares on behalf of Trust)	14,500	0.01%	0.01%
169	Arun Alagappan (Arun Alagappan & A A Alagammai holds shares - M A Alagappan Grand Children Trust)	2,16,777	0.11%	0.11%
170	M A M Arunachalam (M A M Arunachalam & Sigappi Arunachalam hold shares on behalf of Arun Murugappan Children's Trust)	2,20,278	0.11%	0.11%
171	Sigappi Arunachalam (Sigappi Arunachalam, M A M Arunachalam & A M Meyyammai holds shares on behalf of Murugappan Arunachalam Children Trust)	2,15,410	0.11%	0.11%
172	Rhodium Nederland B.V.,	-	-	-
173	Rhodium S.A.R.L., France	-	-	-
174	Rhodium Korea Inc., South Korea	-	-	-
175	Rhodium South America Ltda, Brazil	-	-	-
176	Kan and More Private Limited	-	-	-
177	IPLTech Electric Private Limited	-	-	-
178	Moshine Electronics Private Limited	-	-	-
179	Lotus Surgicals Private Limited	-	-	-
180	3xper Innoventure Limited	-	-	-
181	Coromandel Technology Limited	-	-	-
182	MAVCO Investments Private Limited	-	-	-
183	M M Veerappan	-	-	-
184	Valliammai Murugappan	17,032	0.01%	0.01%
185	Valli Arunachalam	4,96,095	0.26%	0.26%
186	TIVOLT Electric Vehicles Private Limited	-	-	-
187	Jayem Automotives Private Limited	-	-	-
	Total	8,91,43,647	46.11%	46.11%