

**Manoj Gandhi**  
1001, 10<sup>th</sup> Floor, Panorama, LBS Marg,  
Ghatkopar (West), Mumbai – 400 086

Date: January 03, 2022

To,

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

**National Stock Exchange of India Ltd.**  
Exchange Plaza  
Plot no. C/1, G Block,  
Bandra-Kurla Complex,  
Bandra (E),  
Mumbai - 400 051.

Dear Sir,

**Sub: Intimation under Regulation 10(5) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011**


I, the undersigned, propose to acquire 1,00,460 Equity Shares of Gandhi Special Tubes Limited on January 10, 2022 from Mr. Bhupatrai G. Gandhi HUF , who is the Member of Promoter Group of the Company.

I, being the person named under Promoter group, in the shareholding pattern filed by the target company in terms of the listing regulations or these regulations for not less than three years prior to the proposed acquisition, am eligible for exemption under Regulation 10(1)(a)(ii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011, and to this effect I hereby file intimation under Regulation 10(5) of the said Regulations for the proposed transaction.

Kindly take the same on record.

Thanking You,

Yours truly,

  
**Manoj Gandhi**

**Format for Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	GANDHI SPECIAL TUBES LIMITED
2.	Name of the acquirer(s)	MANOJ BHUPATRAI GANDHI
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	PART OF THE PROMOTER GROUP
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	BHUPATRAI G. GANDHI HUF (Promoter Group)
	b. Proposed date of acquisition	January 10, 2022
	c. Number of shares to be acquired from each person mentioned in 4(a) above	1,00,460
	d. Total shares to be acquired as % of share capital of TC	0.83%
	e. Price at which shares are proposed to be acquired	NO CONSIDERATION [Transfer from father (Karta) to Son (Coparcener) as gift due to Partition of Bhupatrai G. Gandhi HUF]
	f. Rationale, if any, for the proposed transfer	BY PARTITION DEED
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	(ii)
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period..	NA
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8	NA
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	NA
9.	i. Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997) ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished	YES  The acquirer hereby declare that the transferor and transferee have complied with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011.



10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	YES The acquirer hereby declare that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total share capital of TC	No. of shares /voting rights	% w.r.t total share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*)	88,15,672	72.54	89,16,132	73.37
b	Seller (s)	1,00,460	0.83	0	0

**Note:**

- (\*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.



SHAREHOLDING OF THE ACQUIRER(S) AND PAC(S) BEFORE THE PROPOSED TRANSACTION

Sr. No.	Name of Shareholder	No of shares held	% of Shares held
1	MANHAR G. GANDHI	17,14,564	14.11
2	MANHAR G. GANDHI (HUF)	74,877	0.62
3	MANHAR G. GANDHI(SMALL HUF)	1,08,849	0.90
4	BHUPATRAI G. GANDHI	16,08,745	13.24
5	BHUPATRAI G. GANDHI (SMALL HUF)	1,03,494	0.85
6	BHUPATRAI G. GANDHI (HUF)	1,00,460	0.83
7	JAYESH M GANDHI	9,75,944	8.03
8	MANOJ B GANDHI	916373	7.54
9	B. M. GANDHI INVESTMENT CO. LLP	440611	3.63
10	GANDHI FINANCE CO. LLP	402090	3.31
11	BHARTI M GANDHI	6,53,760	5.38
12	CHANDRA B GANDHI	3,94,076	3.24
13	JIGNA M GANDHI	3,75,573	3.09
14	GOPI J GANDHI	3,76,335	3.10
15	KARISHMA V KOTHARI	1,99,872	1.64
16	KARAN MANOJ GANDHI	289293	2.38
17	RAHUL JAYESH GANDHI	100649	0.83
18	JIGNA NILESH MEHTA	40,257	0.33
19	BINA TUSHAR SHAH	32,800	0.27
20	NILESH VINODRAI MEHTA	7,510	0.06
	<b>Total</b>	<b>8916132</b>	<b>73.37</b>

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