murugappa

Ambadi Investments Limited
Parry House, 5th Floor,
43, Moore Street, Chennai 600 001, India
Tel: +91.44.2530 6789, +91.44.2530 6441
CIN: U65993TN1942PLC003659

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

National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400 051

Audit Committee
M/s. Tube Investments of India Limited
Dare House, No.234, N.S.C. Bose Road,
Chennai 600 001

Dear Sirs,

Sub: Disclosure under Regulation 31(4) and 31(5)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

In pursuance of Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, it is hereby confirmed that the Promoters and persons belonging to the Promoter Group (Persons acting in concert) of M/s. Tube Investments of India Limited has not made any encumbrance, directly or indirectly other than those already disclosed to the Company during the financial year 2020-21.

This disclosure is also simultaneously being made to the Audit Committee of the Target Company in accordance with Regulation 31(5)(b) of the Regulations.

Kindly take the above on record.

Yours faithfully,
for AMBADI INVESTMENTS LIMITED

M A ALAGAPAN
CHAIRMAN

Place : Chennai
Date : 8th April, 2021

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Parry House, 5th Floor,
43, Moore Street, Chennai 600 001, India
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8th April, 2021

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

Tube Investments of India Ltd.
"Dare House"
234 N S C Bose Road
Chennai – 600 001.

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

Dear Sirs,

Sub: Disclosure under Regulations 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 – Continual disclosure.

In pursuance of Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we submit herewith the details of shareholding/voting rights of Promoters/Promoter Group in M/s.Tube Investments of India Limited, the Target Company, as on 31st March, 2021 in the prescribed form.

Part B of the prescribed form is enclosed for disclosure under the said Regulations which we understand will not be disseminated.

As required under the above referred Regulation, the said disclosure has also been sent to the Target Company.

Kindly take the enclosed disclosure on record and do the needful.

Yours faithfully,
for AMBADI INVESTMENTS LIMITED

M A ALAGAPPAN
CHAIRMAN

Encl:

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43, Moore Street, Chennai 600 001, India
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Disclosures under Regulations 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

PART - A - Details of Shareholding

1.	Name of the Target Company (TC)	TUBE INVESTMENTS OF INDIA LTD
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	1. National Stock Exchange of India Ltd 2. BSE Ltd
3.	Particulars of the shareholder(s) (a) Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in TC) is more than 25% of the voting rights of the TC. or (b) Name(s) of promoter(s), member of the promoter group and PAC with him.	 Provided in (4) below.

Annexure - A

LIST OF PROMOTERS/PROMOTERS GROUP / ~~PACwith him~~ for filing under Reg 30(2)

4	**Particulars of the shareholding of person(s) mentioned at (3) above**				
S No	**Name(s) of the person and Persons Acting in Concert (PAC) with the person**	**Whether the person belongs to Promoter/ Promoter group**	**No. of shares**	**% w.r.t. total share /voting capital**	**% of total diluted share /voting capital**
1	M V Subbiah	Promoter	135000	0.07	0.07
			171200	0.09	0.09
2	M V Seetha Subbiah	Promoter Group	45000	0.02	0.02
3	Sivagami Natesan	Promoter Group	-	-	-
4	Valli Subbiah	Promoter Group		0.00	0.00
5	M V Valli Murugappan	Promoter Group	978190	0.51	0.51
6	Valli Arunachalam	Promoter Group	-	-	-
7	M V Murugappan HUF (Karta - Valli Arunachalam)	Promoter	543330	0.28	0.28
8	M Vellachi	Promoter Group	115330	0.06	0.06
9	Valli Muthiah	Promoter Group	387080	0.20	0.20
10	Umayal R	Promoter Group	226580	0.12	0.12
11	S Vellayan	Promoter		0.00	0.00
12	Kanika Subbiah	Promoter Group	-	-	-
13	Karthik Subbiah	Promoter Group	-	-	-
14	Kabir Subbiah	Promoter Group	-	-	-
15	A Vellayan	Promoter	382400	0.20	0.20
		Promoter	249500	0.13	0.13
16	Lalitha Vellayan	Promoter Group	307160	0.16	0.16
17	Valli Annamalai	Promoter Group	157127	0.08	0.08
18	V Narayanan	Promoter	281140	0.15	0.15
19	Vasantha Vellayan	Promoter Group	2300	0.00	0.00
20	V Arunachalam	Promoter	338990	0.18	0.18
21	Nagalakshmi Arunachalam	Promoter Group	3600	0.00	0.00
22	Anannya Lalitha Arunachalam	Promoter Group	-	-	-
23	A Venkatachalam	Promoter	513610	0.27	0.27
		Promoter	252000	0.13	0.13
24	Meyammai Venkatachalam	Promoter Group	358580	0.19	0.19
25	Arun Venkatachalam	Promoter	198130	0.10	0.10
26	MV.AR Meenakshi	Promoter Group	449630	0.23	0.23
27	M M Murugappan	Promoter	209715	0.11	0.11
			277360	0.14	0.14
			355330	0.18	0.18
28	Meenakshi Murugappan	Promoter Group	70	0.00	0.00
29	M M Veerappan	Promoter	-	-	-
30	Valliammai M	Promoter Group	17032	0.01	0.01
31	M M Seethalakshmi	Promoter Group	-	-	-
32	M M Muthiah	Promoter		0.00	0.00
33	Solachi Ramanathan	Promoter Group	8500	0.00	0.00
34	M M Venkatachalam	Promoter	4000	0.00	0.00
35	Lakshmi Venkatachalam	Promoter Group	1200	0.00	0.00
36	M V Muthiah	Promoter	-	-	-
37	Niranthara Alamelu Jawahar	Promoter Group	-	-	-
38	M V Subramanian	Promoter	-	-	-
39	M A Alagappan	Promoter	710000	0.37	0.37
			130660	0.07	0.07
			-	-	-
40	A A Alagammai	Promoter Group	-	-	-
41	Lakshmi Ramaswamy	Promoter Group	-	-	-
42	Valli Alagappan	Promoter Group	1000	0.00	0.00
43	Arun Alagappan	Promoter	833090	0.43	0.43
44	A Keertika Unnamalai	Promoter Group	500	0.00	0.00
45	Master Pranav Alagappan	Promoter Group	25950	0.01	0.01
46	M A M Arunachalam	Promoter	470160	0.24	0.24
			148660	0.08	0.08
47	Sigappi Arunachalam	Promoter Group	227990	0.12	0.12
48	A M Meyammai	Promoter Group	931500	0.48	0.48
49	Lakshmi Chockalingam	Promoter Group	158660	0.08	0.08
50	Master Dhruv Murugappan Arunachalam	Promoter Group	11000	0.01	0.01
51	Vedhika Meyyammai Arunachalam	Promoter Group	-	-	-
52	E.I.D.PARRY (INDIA) LTD.	Promoter	-	-	-
53	Parry America Inc	Promoter Group	-	-	-
54	Parrys Investments Limited	Promoter Group	-	-	-

S No	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	No. of shares	% w.r.t. total share /voting capital	% of total diluted share /voting capital
55	Parry Infrastructure Company Private Limited	Promoter Group	-	-	-
56	Parrys Sugar Limited	Promoter Group	-	-	-
57	Parry Agrochem Exports Ltd	Promoter Group	-	-	-
58	Coromandel International Ltd (Earlier known as Coromandel Fertilisers Ltd.)	Promoter	-	-	-
59	Alimtec S.A.	Promoter Group	-	-	-
60	Liberty Pesticides & Fertilizers Limited (LPFL)	Promoter Group	-	-	-
61	Parry Chemicals Limited	Promoter Group	-	-	-
62	CFL Mauritius Limited	Promoter Group	-	-	-
63	Sabero Europe BV	Promoter Group	-	-	-
64	Sabero Australia Pty Ltd	Promoter Group	-	-	-
65	Sabero Organics America SA	Promoter Group	-	-	-
66	Sabero Argentina SA	Promoter Group	-	-	-
67	Sabero Organics Philippines Asia Inc.	Promoter Group	-	-	-
68	Coromandel Agronegocios De Mexico S.A. DE C.V. (Formerly Sabero Organics Mexico S.A. de C.V.)	Promoter Group	-	-	-
69	Coromandel Brasil Ltda (Limited Liability Company)	Promoter Group	-	-	-
70	Coromandel SQM (India) Private Ltd.	Promoter Group	-	-	-
71	Yanmar Coromandel Agrisolutions Pvt. Ltd.	Promoter Group	-	-	-
72	Tunisian Indian Fertilizer S.A., Tunisia	Promoter Group	-	-	-
73	Foskor (Pty) Limited, South Africa	Promoter Group	-	-	-
74	US Nutraceuticals LLC	Promoter Group	-	-	-
75	Parry Sugars Refinery India Private Limited (formerly known as Silkroad Sugar Private Ltd)	Promoter Group	-	-	-
76	Algavista Greentech Private Limited	Promoter Group	-	-	-
77	La Bella Botanics LLC	Promoter Group	-	-	-
78	Dare Investments Limited	Promoter Group	-	-	-
79	New Ambadi Estates Pvt. Ltd.	Promoter	-	-	-
80	Ambadi Investments Ltd.	Promoter	68966595	35.77	35.77
81	Parry Enterprises India Ltd.	Promoter Group	-	-	-
82	Parry Agro Industries Ltd. (Formerly Parry Estates Limited)	Promoter Group	-	-	-
83	Ambadi Enterprises Ltd.	Promoter	1058200	0.55	0.55
84	Murugappa Management Services Ltd.	Promoter Group	-	-	-
85	Parry Murray Ltd. UK	Promoter Group	-	-	-
86	Tube Investments of India Ltd. (Formerly, TI Financial Holdings Ltd.)	Promoter	-	-	-
87	TI Tsubamex Pvt Ltd	Promoter Group	-	-	-
88	Financiere C 10	Promoter Group	-	-	-
89	Sedis, SAS	Promoter Group	-	-	-
90	Sedis Company Ltd.	Promoter Group	-	-	-
91	Sedis GmbH	Promoter Group	-	-	-
92	Great Cycles (Private) Limited	Promoter Group	-	-	-
93	Creative Cycles (Private) Limited	Promoter Group	-	-	-
94	Shanthi Gears Ltd.	Promoter Group	-	-	-
95	Cholamandalam Securities Ltd.	Promoter Group	-	-	-
96	Cholamandalam Distribution Services Ltd.	Promoter Group	-	-	-
97	Chola Insurance Distribution Services Pvt. Ltd. (Formerly Chola Insurance Services Pvt. Ltd.)	Promoter Group	-	-	-
98	Chola Business Services Ltd.	Promoter Group	-	-	-
99	Cholamandalam Investment and Finance Co. Ltd.	Promoter Group	-	-	-
100	Kartik Investments Trust Limited	Promoter Group	-	-	-
101	CherryTin Online Private Limited	Promoter Group	-	-	-
102	Cholamandalam MS General Insurance Company Ltd.	Promoter Group	-	-	-
103	Cholamandalam MS Risk Services Ltd.	Promoter Group	-	-	-
104	Chola People Services Private Ltd.	Promoter Group	-	-	-
105	Cholamandalam Health Insurance Ltd.	Promoter Group	-	-	-
106	Cholamandalam Financial Holdings Ltd. (Formerly TI Financial Holdings Ltd. & Tube Investments of India Ltd.)	Promoter	-	-	-

S No	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	No. of shares	% w.r.t. total share /voting capital	% of total diluted share /voting capital
107	TI Absolute Concepts Private Ltd	Promoter Group	-	-	-
108	Carborundum Universal Ltd.	Promoter	1000	0.00	0.00
109	CUMI America Inc.	Promoter Group	-	-	-
110	Net Access (India) limited	Promoter Group	-	-	-
111	Southern Energy Development Corporation Ltd.	Promoter Group	-	-	-
112	Sterling Abrasives Ltd.	Promoter Group	-	-	-
113	CUMI (Australia) Pty Ltd	Promoter Group	-	-	-
114	CUMI Middle East FZE	Promoter Group	-	-	-
115	CUMI International Ltd	Promoter Group	-	-	-
116	Volszhsky Abrasives Works	Promoter Group	-	-	-
117	Foskor Zirconia Pty Limited, South Africa	Promoter Group	-	-	-
118	CUMI Abrasives and Ceramics Company Ltd, China	Promoter Group	-	-	-
119	CUMI Europe s.r.o	Promoter Group	-	-	-
120	Wendt (India) Ltd.	Promoter Group	-	-	-
121	Murugappa Morgan Thermal Ceramics Ltd.	Promoter Group	-	-	-
122	CIRIA India Ltd.	Promoter Group	-	-	-
123	Coromandel Engineering Company Limited	Promoter Group	-	-	-
124	Murugappa Educational & Medical Foundation	Promoter Group	726200	0.38	0.38
125	M A Alagappan Holdings Private Limited	Promoter Group	509860	0.26	0.26
126	AMM Vellayan Sons P Ltd.	Promoter Group	38430	0.02	0.02
127	MM Muthiah Sons P Ltd.	Promoter Group	4200	0.00	0.00
128	Kadamane Estates Company	Promoter Group	-	-	-
129	Yelnoorkhan Group Estates	Promoter Group	-	-	-
130	Murugappa & Sons (M.V.MURUGAPPAN, M A Alagappan and M M Murugappan hold shares on behalf of the Firm)	Promoter	863980	0.45	0.45
131	MM Muthiah Research Foundation	Promoter Group	280920	0.15	0.15
132	M A Murugappan Holdings LLP (Formerly M A Murugappan Holdings Pvt Limited- PAN AAHCM3026E)	Promoter Group	546860	0.28	0.28
133	AMM Foundation	Promoter Group	-	-	-
134	Genfour Properties Pvt. Ltd.	Promoter Group	-	-	-
135	A R Lakshmi Achi Trust	Promoter Group	391510	0.20	0.20
136	M V Seetha Subbiah Benefit Trust *(S Vellayan & A Vellayan holds shares on behalf of the Trust)*	Promoter Group	14500	0.01	0.01
137	Valli Subbiah Benefit Trust *(S Vellayan & A Vellayan holds shares on behalf of the Trust)*	Promoter Group	14500	0.01	0.01
138	MA.Alagappan Grand Children Trust *(Arun Alagappan & A A Alagammai holds shares on behalf of the Trust)*	Promoter Group	216777	0.11	0.11
139	Arun Murugappan Children's Trust *(MAM Arunachalam & Sigappi Arunachalam holds shares on behalf of the Trust)*	Promoter Group	220278	0.11	0.11
140	Murugappan Arunachalam ChildrenTrust *(M.A.ALAGAPPAN & M A M Arunachalam holds shares on behalf of the Trust)*	Promoter Group	215410	0.11	0.11
141	V S Bhairavi Trust *(M V Subbiah & Kanika Subbiah holds shares on behalf of the Trust)*	Promoter Group	-	-	-
142	K S Shambhavi Trust *(M V Subbiah & S Vellayan holds shares on behalf of the Trust)*	Promoter Group	-	-	-
143	Lakshmi Ramaswamy Family Trust *(A A Alagammai & Lakshmi Ramaswamy holds shares on behalf of the Trust)*	Promoter Group	743000	0.39	0.39
144	M M Muthiah Family Trust (M M Murugappan & M M Muthiah holds shares on behalf of the Trust)	Promoter Group	478055	0.25	0.25

S No	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	No. of shares	% w.r.t. total share /voting capital	% of total diluted share /voting capital
145	M M Veerappan Family Trust (M M Murugappan & Meenakshi Murugappan holds shares on behalf of the Trust)	Promoter Group	468055	0.24	0.24
146	M V Muthiah Family Trust (M M Venkatachalam and M V Muthiah holds shares on behalf of the Trust)	Promoter Group	459830	0.24	0.24
147	M V Subramanian Family Trust (M M Venkatachalam & M V Subramanian *holds shares on behalf of the Trust)*	Promoter Group	459830	0.24	0.24
148	Lakshmi Venkatachalam Family Trust (M M Venkatachalam and Lakshmi Venkatachalam holds shares on behalf of the Trust)	Promoter Group	379905	0.20	0.20
149	Meenakshi Murugappan Family Trust (M M Murugappan and Meenakshi Murugappan, holds shares on behalf of the Trust)	Promoter Group	500000	0.26	0.26
150	M M Venkatachalam Family Trust M M Venkatachalam and Lakshmi Venkatachalam holds shares on behalf of the Trust)	Promoter Group	403900	0.21	0.21
151	M M Murugappan Family Trust M M Murugappan and Meenakshi Murugappan holds shares on behalf of the Trust)	Promoter Group	231800	0.12	0.12
152	Saraswathi Trust (M V Subbiah & S Vellayan holds shares on behalf of the Trust)	Promoter Group	549860	0.29	0.29
153	Shambho Trust (M V Subbiah & S Vellayan holds shares on behalf of the Trust)	Promoter Group	603180	-	-
154	Uma Ramanathan	Promoter Group	2000	0.00	0.00
155	Bollampallay Rishika Reddy	Promoter Group	-	-	-
156	Ahana Lalitha Narayanan	Promoter Group	-	-	-
157	Coromandel International (Nigeria) Limited	Promoter Group	-	-	-
158	Parry International DMCC	Promoter Group	-	-	-
159	Coromandel Mali SASU, West Africa	Promoter Group	-	-	-
160	E.I.D. Parry Europe B.V	Promoter Group	-	-	-
161	Krishna Murugappa Muthiah	Promoter Group	-	-	-
162	CG Power and Industrial Solutions Ltd.	Promoter Group	-	-	-
		TOTAL	**89,966,889**	**46.66**	**46.66**