

Rahul Gandhi
A-303, MANGAL KUNJ, MOUNT PLEASANT ROAD, MUMBAI – 400006

Date: April 9, 2019

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 of Acquisition under Regulation 10(6) of the SEBI (Acquisition of Shares and Takeover) Regulation, 2011

I, the undersigned, have acquired 50,000 Equity Shares of M/s. Gandhi Special Tubes Limited on April 8, 2019 from Mr. Manhar Gandhi, who is the Promoter 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 agreement 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(6) of the said Regulations for the said transaction.

Please note that the intimation under Regulation 10(5) of the said Regulations has already been filed with your good office on April 1, 2019.

Kindly take the same on record.

Thanking You,

Yours truly,



Rahul Gandhi

Encl: A/a

DISCLOSURE UNDER REGULATION 10(6)- REPORT TO STOCK EXCHANGE 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)	GANDHI SPECIAL TUBES LIMITED			
2.	Name of the Acquirer	RAHUL GANDHI			
3.	Name of the Stock Exchange where shares of the TC are listed	BSE LTD NATIONAL STOCK EXCHANGE OF INDIA LTD (NSE)			
4.	Details of the transaction including rationale, if any, for the transfer/acquisition of shares	BY GIFT DEED (INTER-SE TRANSFER)			
5.	Relevant regulation under which the acquirer is exempted from making open offer	10(1)(a)(ii)			
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 under the regulations - date of filing with the stock exchange	YES. The same was made within the time limit i.e. Four working days prior to proposed date of acquisition. (Copy of the letter dated April 1, 2019 attached herewith)			
7.	Details of acquisition	Disclosures made/ required to be made under regulation 10(5)		Whether the disclosures under regulation 10(5) are actually made	
	(a) Name of the Transferor/seller	MANHAR GANDHI		MANHAR GANDHI	
	(b) Date of acquisition	08/04/2019			
	(c) Number of shares/voting rights in respect of the acquisitions from each person mentioned in 7(a) above	50000 (0.36%)		50000 (0.36%)	
	(d) Total shares proposed to be acquired/actually acquired as a % of diluted share capital TC	50000 (0.36%)		50000 (0.36%)	
	(e) Price at which shares are proposed to be acquired/actually acquired	GIFT (No Consideration)		GIFT (No Consideration)	
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
	- Each Acquirer/Transferee(*)	65120	0.47	115120	0.83
	- Each Seller/Transferor	1989375	14.4	1939375	14.03

Note:

- (*) Shareholding of each entity shall 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.

Rahul Gandhi
A-303, MANGAL KUNJ, MOUNT PLEASANT ROAD, MUMBAI - 400006

Date: April 1, 2019

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

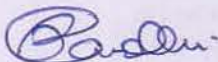
I, the undersigned, propose to acquire 50,000 Equity Shares of Gandhi Special Tubes Limited on April 8, 2019 from Mr Manhar Gandhi, who is the Promoter of the Company.

I, being the person named under Promoter group, in the shareholding pattern filed by the target company in terms of the listing agreement 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,



Rahul 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)	RAHUL 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	MANHAR GANDHI (Promoter)
	b. Proposed date of acquisition	April 8, 2019
	c. Number of shares to be acquired from each person mentioned in 4(a) above	50,000
	d. Total shares to be acquired as % of share capital of TC	0.36%
	e. Price at which shares are proposed to be acquired	NO CONSIDERATION (Transfer from Grandfather to Grandson as gift)
	f. Rationale, if any, for the proposed transfer	BY GIFT 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	<table><tr><th colspan="2">Before the proposed transaction</th><th colspan="2">After the proposed transaction</th></tr><tr><th>No. of shares /voting rights</th><th>% w.r.t total share capital of TC</th><th>No. of shares /voting rights</th><th>% w.r.t total share capital of TC</th></tr><tr><td>a</td><td>Acquirer(s) and PACs (other than sellers)(*)</td><td>8134257</td><td>58.86</td><td>8184257</td><td>59.27</td></tr><tr><td>b</td><td>Seller (s)</td><td>1989375</td><td>14.40</td><td>1939375</td><td>14.03</td></tr></table>	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)(*)	8134257	58.86	8184257	59.27	b	Seller (s)	1989375	14.40	1939375	14.03
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)(*)	8134257	58.86	8184257	59.27																	
b	Seller (s)	1989375	14.40	1939375	14.03																	

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	19,89,375	14.4
2	MANHAR G. GANDHI(SMALL HUF)	125036	0.90
3	MANHAR G. GANDHI(HUF)	84730	0.61
4	BHUPATRAI G. GANDHI	18,22,840	13.19
5	BHUPATRAI G. GANDHI (SMALL HUF)	119042	0.86
6	BHUPATRAI G. GANDHI (HUF)	113323	0.82
7	JAYESH M GANDHI	1099796	7.96
8	MANOJ B GANDHI	1033260	7.48
9	B. M. GANDHI INVESTMENT CO. LLP	516388	3.74
10	GANDHI FINANCE CO. LLP	471241	3.41
11	BHARTI M GANDHI	739022	5.35
12	CHANDRA B GANDHI	443762	3.21
13	JIGNA M GANDHI	423338	3.06
14	GOPI J GANDHI	429077	3.11
15	KARISHMA J GANDHI	230510	1.67
16	KARAN MANOJ GANDHI	328972	2.38
17	RAHUL JAYESH GANDHI	65120	0.47
18	JIGNA NILESH MEHTA	47,200	0.34
19	BINA TUSHAR SHAH	32,800	0.24
20	NILESH VINODRAI MEHTA	8,800	0.06
	Total	10123632	73.26

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

Sr		No of shares	% of Shares
No.	Name of Shareholder	held	held
1	MANHAR G. GANDHI	1939375	14.03
2	MANHAR G. GANDHI(SMALL HUF)	125036	0.90
3	MANHAR G. GANDHI(HUF)	84730	0.61
4	BHUPATRAI G. GANDHI	18,22,840	13.19
5	BHUPATRAI G. GANDHI (SMALL HUF)	119042	0.86
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14	GOPI J GANDHI	429077	3.11
15	KARISHMA J GANDHI	230510	1.67
16	KARAN MANOJ GANDHI	3,28,972	2.38
17	RAHUL JAYESH GANDHI	115120	0.83
18	JIGNA NILESH MEHTA	47,200	0.34
19	BINA TUSHAR SHAH	32,800	0.24
20	NILESH VINODRAI MEHTA	8,800	0.06
	Total	1,01,23,632	73.26