Manhar G. Gandhi

303, Mangal Kunj, Mount Pleasant Road, Malabar Hill, Mumbai-400006
Tel No: 23670403/23624561

Date: 02.04.2019

THE NATIONAL STOCK EXCHANGE OF INDIA LTD
Exchange Plaza,
Plot No/1, G Block
Bandra-Kurla Complex
Bandra (East)
Mumbai – 400051

Company Code: *GANDHITUBE*

Subject: Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Dear Sir/Madam,

I in my personal capacity and on behalf of my brother Mr. Bhupatrai G. Gandhi, forward herewith information as required under regulation 30(1) and 30(2) of SEBI (Substantial Acquisition & Takeover) Regulation, 2011 as on 31st March, 2019.

Please acknowledge the receipt.

Thanking You,

Yours truly,

Manhar G. Gandhi
For myself and for my brother
Mr. Bhupatrai G. Gandhi.

CC: **Compliance Officer,**
Gandhi Special Tubes Limited
201-204 Plaza, 2nd Floor,
55 Hughes Road,
Next to Dharam Palace,
Mumbai - 400007

Disclosures under Regulation 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)	**M/S GANDHI SPECIAL TUBES LIMITED**		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	**1. BSE LIMITED** **2. NATIONAL STOCK EXCHANGE OF INDIA LIMITED**		
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 the TC) is more than 25% of the voting rights of the TC. **(Not applicable)** or b. Name(s) of promoter(s), member of the promoter group and PAC with him.		**No of shares**	**%**
	A. PROMOTERS		
	• Manhar G. Gandhi	19,89,375	14.40
	• Bhupatrai G. Gandhi	18,22,840	13.19
	Total A	**38,12,215**	**27.59**
	B. **PROMOTER GROUP AND PERSON ACTING IN CONCERT (PAC)**		
	• Jayesh M. Gandhi	1099796	7.96
	• Manhar G. Gandhi (Small HUF)	125036	0.90
	• Manhar G. Gandhi (HUF)	84730	0.61
	• Bhupatrai G. Gandhi (Small HUF)	119042	0.86
	• Bhupatrai G. Gandhi (HUF)	113323	0.82
	• Chandra B. Gandhi	443762	3.21
	• Bharti M. Gandhi	739022	5.35
	• Gopi J. Gandhi	429077	3.11
	• Jigna M. Gandhi	423338	3.06
	• Karan M. Gandhi	328972	2.38
	• Karishma J. Gandhi	230510	1.67
	• Manoj B. Gandhi	1033260	7.48
	• Rahul J. Gandhi	65120	0.47
	• Bina T. Shah	32,800	0.24
	• Jigna N. Mehta	47,200	0.34
	• Nilesh V. Mehta	8,800	0.06
	Total B	**5323788**	**38.53**

BHUPATRAI GORDHANDAS GANDHI

	C. BODY CORPORATES IN WHICH PROMOTERS PAC HOLD CONTROLLING INTEREST			
	• B. G. Gandhi Investment Co. LLP		516388	3.74
	• Gandhi Finance Co. LLP		471241	3.41
	Total C		**9,87,629**	**7.15**
	TOTAL (A+B+C)		**1,01,23,632**	**73.26**
4. Particulars of the Shareholding of persons mentioned at (3) above	Number of Shares	% w.r.t .total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)	
As of March 31st of the year, holding of:				
i. Shares	1,01,23,632	73.26%	**N.A**	
ii. Voting Rights (otherwise than by shares)	NIL	NIL		
iii. Warrants,	NIL	NIL		
iv. Convertible Securities	NIL	NIL		
v. Any other instrument that would entitle the holder to receive shares in the TC.				
TOTAL				
Total	**1,01,23,632**	**73.26%**		

Appl

BHUPATRAI GORDHANDAS GANDHI

Digitally signed by BHUPATRAI GORDHANDAS GANDHI
DN: c=IN, o=Personal, postalCode=400066, st=Maharashtra, 2.5.4.20=f111bf2960435adf1127c1744a3ff71a312a14f0e1115804b9fd30947be352, serialNumber=3d140799c5c4c99a2dff6fd7f6655f96f67c5bcad6dc6c723f311faf5b45928d8f4, cn=BHUPATRAI GORDHANDAS GANDHI
Date: 2019.04.01 14:19:08 +05'30'

BHUPATRAI GORDHANDAS GANDHI

Manhar G. Gandhi
(Signature)

Bhupatrai G. Gandhi
(Signature)

Date: 02/04/2019
Place: Mumbai

CC: Compliance Officer,
Gandhi Special Tubes Limited
201-204 Plaza, 2nd Floor,
55 Hughes Road,
Next to Dharam Palace,
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