

Rahul Gandhi
1402, 14th Floor, 208, Soham Apartment,
Walkeshwar Road, Mumbai:- 400 006

Date: 22/09/2025

To,
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai -400 001

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

Scrip Code: 513108

Symbol: GANDHITUBE

Dear Sir/ Madam,

Sub: Disclosure of inter-se transfer of shares among the Promoter and Promoter Group pursuant to Regulation 10(5) of SEBI SAST Regulations, 2011

Ref.: Prior Intimation for proposed acquisition of shares by way of gift amongst the Promoters and Promoter Group of the Company.

With regard to the captioned subject, I, the undersigned, hereby submit disclosure in the prescribed format under Regulation 10(5) of the Securities and Exchange Board of India ("SEBI") (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulations") in respect of proposed acquisition by way of gift of 2,00,000 (Two Lakhs) Equity Shares of Gandhi Special Tubes Limited through an off-market inter-se transfer between Manhar Gandhi (Transferor) and Mr. Rahul Gandhi (Acquirer) both being part of Promoter and Promoter Group without consideration.

Please note that this transaction, being inter-se transfer of shares amongst the promoters (including promoter group) of the Company, falls within the exemption provided under Regulation 10(1)(a)(ii) of the SEBI SAST Regulations. The Aggregate holding of promoter and promoter group before and after the above inter-se transaction shall remain the same.

In this connection necessary disclosure under Regulation 10(5) of the SEBI SAST Regulations in respect of aforesaid acquisition in the prescribed format is enclosed herewith for your kind information and records. The same may please be taken on record and suitably disseminated to all concerned.

Thanking you,

Yours Sincerely,



Rahul Gandhi

Encl. As above

CC TO:

Compliance Officer
Gandhi Special Tubes Limited
201-204, Plaza, 55 Hughes Road,
Mumbai - 400007

Email Id : complianceoffcier@gandhitubes.com

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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 Tube Limited
2.	Name of the acquirer	Mr. 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	Yes, Part of the promoter Group
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Mr. Manhar Gandhi
	b. Proposed date of acquisition	26.09.2025
	c. Number of shares to be acquired from each person mentioned in 4(a) above	2,00,000
	d. Total shares to be acquired as % of share capital of TC	1.65%
	e. Price at which shares are proposed to be acquired	Nil, since proposed off market Inter-se transfer of shares will be by way of Gift from grandfather to grandson.
	f. Rationale, if any, for the proposed transfer	The proposed acquisition is only a private family arrangement.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	10(i)(a)(ii) of the Securities and Exchange Board of India ("SEBI") (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulations")

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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.	Not Applicable
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8	Not Applicable
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.	Not Applicable, since proposed off market Inter-se transfer of shares will be by way of gift, therefore, no consideration is involved.
9.	<p>1. 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)</p>	With respect to proposed inter-se transfer of shares in terms of Regulation 10(1)(a)(ii) of SEBI SAST Regulations and subsequent amendments thereto, it is hereby declared and confirmed that the transferors and transferees have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the SEBI SAST Regulations.
	<p>2. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished</p>	Copies of the disclosure made during the previous 3 years prior to the date of the proposed acquisition is enclosed as Annexure - I
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	It is hereby declared and confirmed that all the conditions specified under Regulations 10(i)(a)(ii) of the SEBI SAST Regulations with respect to exemptions have been duly complied with.

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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.	<u>Acquirer</u>				
1.	Mr. Rahul Gandhi (Acquire)	1,00,649	0.83%	3,00,649	2.48%
	<u>PACs</u>				
2.	Manhar G. Gandhi (Small HUF)	1,08,849	0.90 %	1,08,849	0.90 %
3.	Bhupatrai G. Gandhi	16,08,745	13.24%	16,08,745	13.24%
4.	Bhupatrai G. Gandhi (Small HUF)	1,03,494	0.85%	1,03,494	0.85%
5.	Jayesh M Gandhi	10,50,821	8.65%	10,50,821	8.65%
6.	Manoj B Gandhi	10,16,833	8.37%	10,16,833	8.37%
7.	B. M. Gandhi Investment Co. LLP	4,40,611	3.63%	4,40,611	3.63%
8.	Gandhi Finance Co. LLP	4,02,090	3.31%	4,02,090	3.31%
9.	Bharti M Gandhi	6,53,760	5.38%	6,53,760	5.38%
10.	Chandra B Gandhi	3,94,076	3.24%	3,94,076	3.24%
11.	Jigna M Gandhi	3,75,573	3.09%	3,75,573	3.09%
12.	Gopi J Gandhi	3,95,460	3.25%	3,95,460	3.25%
13.	Karishma V Kothari	1,99,872	1.64%	1,99,872	1.64%
14.	Karan Manoj Gandhi	2,89,293	2.38%	2,89,293	2.38%
15.	Jigna Nilesh Mehta	40,257	0.33%	40,257	0.33%
16.	Bina Tushar Shah	32,800	0.27%	32,800	0.27%
17.	Nilesh Vinodrai Mehta	7,510	0.06%	7,510	0.06%
	Total (a)	72,20,693	58.59%	74,20,693	60.24%

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	b.	Seller (s)				
	18.	Mr. Manhar Gandhi	17,14,564	14.11%	15,14,564	12.46%
		Total b	17,14,564	14.11%	15,14,564	12.46%
		Total (a)+ (b)	89,35,257	73.53%	89,35,257	73.53%

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

Thanking you,

Yours Sincerely,



Rahul Gandhi

Date : 22 September 2025

Place : Mumbai

Annexure - I

Compliance of Disclosure requirements under chapter V of the of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Date of Reporting	Regulations	Nature of Compliance
04.04.2025	31(4)	Continual Disclosure
04.04.2024	31(4)	Continual Disclosure
04.04.2023	31(4)	Continual Disclosure