

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

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The Manager  
Listing Compliance  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400001

Date : 15 December 2025

**Subject: Revised Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Gandhi Special Tubes Limited**

Dear Sir / Madam,

With reference to the email dated 12 December 2025 and the observation regarding the disclosure submitted under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in respect of Gandhi Special Tubes Limited, I wish to submit as under:

It was observed that the earlier disclosure inadvertently did not include the shareholding after the transaction. Accordingly, the disclosure has been revised and resubmitted in the prescribed format, incorporating the complete details as required under Regulation 29(2) of the said Regulations. Enclosed herewith the revised disclosure

The revision has been made only to rectify the above-mentioned omission, and there is no change in the transaction details already disclosed earlier.

I request you to kindly take the revised disclosure on record.

Thanking you.

Yours faithfully,



Rahul Gandhi

**CC TO:**

Compliance Officer  
Gandhi Special Tubes Limited  
201-204, Plaza, 55 Hughes Road ,  
Mumbai - 400007  
Email Id : [complianceoffcier@gandhitubes.com](mailto:complianceoffcier@gandhitubes.com)

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**Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Sr. No	Particulars	Details		
1.	Name of the Target Company (TC)	Gandhi Special Tubes Limited		
2.	Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Mr. Rahul Gandhi		
3.	Whether the acquirer belongs to Promoter/Promoter group	Yes		
4.	Name(s) of the Stock Exchange(s) where the shares of TC are Listed	1. BSE Limited 2. National Stock Exchange of India		
5.	Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
	<b>Before the acquisition under consideration, holding of</b>			
	a. Shares carrying voting rights	1,00,649	0.83%	0.83%
	b. Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	-	-	-
	c. Voting rights (VR) otherwise than by shares	-	-	-
	d. Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the Target Company (specify holding in each category)	-	-	-

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	e.	Total (a+b+c+d)	1,00,649	0.83%	0.83%
	<b>Details of acquisition/sale</b>				
	a.	Shares carrying voting rights acquired/sold	2,00,000	1.65%	1.65%
	b.	VRs acquired / sold otherwise than by shares	-	-	-
	c.	Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	-	-	-
	d.	Shares encumbered / invoked/released by the acquirer	-	-	-
	e.	Total (a+b+c+/-d)	2,00,000	1.65%	1.65%
	<b>After the acquisition/sale, holding of:</b>				
	a.	Shares carrying voting rights	3,00,649	2.47%	2.47%
	b.	Shares encumbered with the acquirer	-	-	-
	c.	VRs otherwise than by shares	-	-	-
	d.	Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	-	-	-
	e.	Total (a+b+c+d)	3,00,649	2.47%	2.47%
6.	Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).		Off-market inter se transfer between Promoter and Promoter Group (by way of gift)		
7.	Date of acquisition / sale of shares / VR or date of receipt of intimation of		26.09.2025		

	allotment of shares, whichever is applicable	
8.	Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs. 6,07,60,000/- (1,21,52,000 Equity shares of Rs. 5/- each )
9.	Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 6,07,60,000/- (1,21,52,000 Equity shares of Rs. 5/- each)
10.	Total diluted share/voting capital of the TC after the said acquisition	Rs. 6,07,60,000/- (1,2,15,2,000 Equity shares of Rs. 5/- each)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the StockExchange under Clause 35 of the listing Agreement.

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Thanking You,

Yours Sincerely,



**Mr. Rahul Gandhi**  
(Acquirer)

Place: Mumbai

Date: 15 December 2025