

**Date: July 23, 2021**

To,  
**BSE Limited**  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
**Axita Cotton Limited**  
Servey No. 324 357 358 Kadi Thol Road Borisana  
Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

**Sub: Clarification Letter regarding Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 submitted on July 14, 2021.**

**Ref: Disclosure submitted on July 14, 2021 under the Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel (My Self) to Nitinbhai Govindbhai Patel.**

With reference to earlier disclosure submitted on July 14, 2021 under the Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel (My Self) to Mr. Nitinbhai Govindbhai Patel has completed on July 21, 2021.

Earlier disclosure (dated July 14, 2021) submitted based on delivery instruction slip dated July 12, 2021 executed by me for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited in which requisite procedural requirements was pending from NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited), which has completed on July 21, 2021.

This letter is a clarification letter for giving information about earlier Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel (My Self) to Mr. Nitinbhai Govindbhai Patel has completed on July 21, 2021.

This letter is not an intimation of any new transaction. Please treat this letter as a clarification letter regarding earlier disclosure submitted on July 14, 2021 under the Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011. Therefore, I request you not consider this letter as a new intimation under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

*Amit C. Patel*

I hope that I have made my intentions clear in this letter.

A copy of the earlier disclosure submitted on July 14, 2021 under the Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 is enclosed for ready reference.

Kindly take this information on your record.

Thanking You.

*Amit C. Patel*

**Amitkumar Govindbhai Patel**  
**Seller**  
**(Promoter)**

**Enclosed: A/a.**

Date: July 14, 2021

To,  
BSE Limited  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
Axita Cotton Limited  
Servey No. 324 357 358 Kadi Thol Road Borisana Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

**Sub: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.**

I, Amitkumar Govindbhai Patel, promoter of Axita Cotton Limited hereby submit disclosures under the Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited to Nitinbhai Govindbhai Patel.

I, Amitkumar Govindbhai Patel hereby submits this disclosure based on delivery instruction slip (hereinafter known as "DIS" dated July 12, 2021) submitted by me and requisite procedural requirements of NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited) are under process for transfer of 6,76,000 Locked-in Equity Shares. I am submitting this disclosure herewith for better compliance purposes. I will further submit disclosure post completion process of inter-se transfer of 6,76,000 Locked-in Equity Shares.

In view of the subject matter, you are requested to take this on records and do the needful.

Kindly take this information on your record.

Thanking You.

*Amit C. Patel*

Amitkumar Govindbhai Patel  
Seller  
(Promoter)

Enclosed: A/a.

Disclosures under Regulation 29(2) of  
SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	AXITA COTTON LIMITED (BSE SECURITY CODE: 542285)		
Name(s) of the acquirer/seller and Persons Acting in Concert (PAC) with the acquirer	Seller: Amitkumar Govindbhai Patel Acquirer: Nitinbhai Govindbhai Patel PACs: Kushal Nitinbhai Patel Gitaben Nitinbhai Patel Gitaben Amitbhai Patel Pooja Kushal Patel Krunalbhai Girishkumar Patel		
Whether the acquirer/seller belongs to Promoter / Promoter group	Yes - Promoter		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
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 (**)
BEFORE THE ACQUISITION/DISPOSAL UNDER CONSIDERATION, HOLDING OF ACQUIRER/SELLER ALONG WITH PAC:			
a) Shares carrying voting rights			
i. Amitkumar Govindbhai Patel	8,76,400	6.688	6.688
ii. Nitinbhai Govindbhai Patel	41,15,000	31.403	31.403
Person Acting in Concert			
iii. Kushal Nitinbhai Patel	39,97,048	30.503	30.503
iv. Gitaben Nitinbhai Patel	4,52,352	3.452	3.452

Amit C. Patel

v. Gitaben Amitbhai Patel	3,000	0.023	0.023
vi. Pooja Kushal Patel	40,000	0.305	0.305
vii. Krunalbhai Girishkumar Patel	200	0.002	0.002
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 TC (specify holding in each category)	-	-	-
e) Total (a+b+c+d)	94,84,000	72.375	72.375
<b>DETAILS OF ACQUISITION/SALE</b>			
a) Shares carrying voting rights acquired/sold			
Amitkumar Govindbhai Patel	(6,76,000)	(5.159)	(5.159)
Nitinbhai Govindbhai Patel	6,76,000	5.159	5.159
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/seller	-	-	-
e) Total (a+b+c+/-d)	0	0.000	0.000
<b>After the acquisition/sale, holding of acquirer/seller along with PAC:</b>			
a) Shares carrying voting rights:			
i. Amitkumar Govindbhai Patel	2,00,400	1.529	1.529
ii. Nitinbhai Govindbhai Patel	47,91,000	36.561	36.561
<b>Person Acting in Concert</b>			
iii. Kushal Nitinbhai Patel	39,97,048	30.503	30.503

Amit C. Patel

iv. Gitaben Nitinbhai Patel	4,52,352	3.452	3.452
v. Gitaben Amitbhai Patel	3,000	0.023	0.023
vi. Pooja Kushal Patel	40,000	0.305	0.305
vii. Krunalbhai Girishkumar Patel	200	0.002	0.002
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/disposal	-	-	-
e) Total (a+b+c+d)	94,84,000	72.375	72.375
Modes of acquisition/sale (e.g. open market /off market/ public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer of locked-in Equity Shares through Off-Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable.	July 12, 2021 (Date of submit delivery instruction slip)		
Equity share capital / total voting capital of the TC before the said acquisition/sale	1,31,04,000 Equity Shares of Rupees 10.00/- each aggregating to Rupees 13,10,40,000/-.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	1,31,04,000 Equity Shares of Rupees 10.00/- each aggregating to Rupees 13,10,40,000/-.		
Total diluted share/voting capital of the TC after the said acquisition/sale	1,31,04,000 Equity Shares of Rupees 10.00/- each aggregating to Rupees 13,10,40,000/-.		

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange 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.

*Amit Patel*

Amitkumar Govindbhai Patel  
Seller (Promoter)

Date: July 14, 2021 Place: Kadi