

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

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

Axita Cotton Limited (Security Code/Security Id: 542285/AXITA).

Respected Sir/Madam,

Sub.: Clarification letter regarding Intimation report dated July 16, 2021, under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

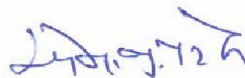
Ref.: Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover Regulations) 2011.

With reference to our earlier Intimation report dated July 16, 2021, under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011 for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares from Mr. Amitkumar Govindbhai Patel to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011. Earlier, Intimation report dated July 16, 2021 under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) was filed based on Delivery Instruction Slip dated July 12, 2021 hereinafter known as “DIS” which had executed by Mr. Amitkumar Govindbhai Patel forming part of promoter of Axita Cotton Limited has completed on July 21, 2021.

This letter is not an intimation of any new transaction. 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 to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover Regulations) 2011 has completed on July 21, 2021.

I am giving this letter regarding Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover Regulations) 2011, which was pending because of procedural requirements of NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited) has completed on July 21, 2021.

Please treat this letter as a clarification letter regarding intimation report dated July 16, 2021 under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011. Therefore, I request you not consider this letter as a new intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011. I hope that I have made my intentions clear in this letter.



NITINBHAI GOVINDBHAI PATEL

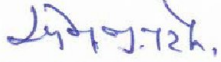
Address: B/303 Ashutosh Avenue, Opp. Vasupujya Tower, Naranpura, Ahmedabad-380013, Gujarat

The copy of earlier intimation report dated July 16, 2021 under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011 is enclosed for ready reference.

You are requested to kindly record the same.

Thanking You

Yours Faithfully,



Nitinbhai Govindbhai Patel
Acquirer (Promoter)

Place: Kadi

Date: July 22, 2021

Encl: As Above.

NITINBHAI GOVINDBHAI PATEL

Address: B/303 Ashutosh Avenue, Opp. Vasupujya Tower, Naranpura, Ahmedabad-380013, Gujarat

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

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

Axita Cotton Limited (Security Code/Security Id: 542285/AXITA).

Respected Sir/Madam,

Sub.: Intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

Ref.: Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover Regulations) 2011.

Pursuant to Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011 (hereinafter referred to as "SEBI SAST"), please find attached herewith enclosed report w.r.t. inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares on July 12, 2021 (Based on Delivery Instruction Slip hereinafter known as "DIS" has executed by Mr. Amitkumar Govindbhai Patel) of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel to me under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

Mr. Amitkumar Govindbhai Patel forming part of promoter inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares on July 12, 2021 (Based on Delivery Instruction Slip hereinafter known as "DIS" has executed by Mr. Amitkumar Govindbhai Patel) to me.

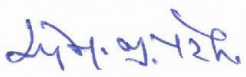
Further we would like to inform your good offices that on June 28, 2021, we had made disclosures under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011 w.r.t. acquisition through inter se transfer of 14,24,400 Equity Shares (including 8,76,000 locked-in equity shares) in one or more tranches of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel forming part of Promoter to me pursuant under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011.

Note: This disclosure is submitting herewith for better compliance purpose based on Delivery Instruction Slip has executed by Mr. Amitkumar Govindbhai Patel. I will further intimate the date on which transfer will be completed because 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.

You are requested to kindly record the same.

Thanking You

Yours Faithfully,


Nitinbhai Govindbhai Patel
Acquirer (Promoter)

Place: Kadi

Date: July 16, 2021

Disclosures under Regulation 10(6) –Report to Stock Exchanges 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

Sr. No.	Particulars	Details	
1.	Name of the Target Company (TC)	Axita Cotton Limited (BSE Scrip Code: 542285)	
2.	Name of the acquirer(s)	Nitinbhai Govindbhai Patel (Promoter)	
3.	Name of the stock exchange where shares of the TC are listed	BSE Limited	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se Transfer of 6,76,000 Locked-in Equity Shares between Promoters due to family re-arrangement through off-market constituting 5.159 % of paid up share capital of the company.	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(i) of SEBI (SAST) Regulations, 2011	
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so,	Yes	
	• Whether disclosure was made and whether it was made within the timeline specified under the regulations.	Yes	
	• date of filing with the stock exchange.	June 28, 2021	
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made
	a) Name of the transferor / seller	Mr. Amitkumar Govindbhai Patel	Yes On June 28, 2021
	b) Date of acquisition	July 12, 2021 (Based on Delivery Instruction Slip has executed by Mr. Amitkumar Govindbhai Patel)	Yes On June 28, 2021
	c) Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above 6,76,000 Locked-in Equity Shares inter-se transfer through off-market from Mr. Amitkumar Govindbhai Patel on July 12, 2021 (Based on Delivery Instruction Slip has executed by Mr. Amitkumar Govindbhai Patel) to me.	6,76,000 Locked-in Equity Shares (Acquisition)	Yes On June 28, 2021

(Handwritten signature)

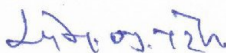
NITINBHAI GOVINDBHAI PATEL

Address: B/303 Ashutosh Avenue, Opp. Vasupujya Tower, Naranpura, Ahmedabad-380013, Gujarat

	d) Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	14,24,400 Equity Shares (including 8,76,000 Locked-in Equity Shares) (Proposed to be acquired constituting 10.870%) 6,76,000 Locked-in Equity Shares (Actually acquired constituting 5.159%)	Yes On June 28, 2021
	e) Price at which shares are proposed to be acquired / actually acquired	Acquired at ₹ 27.60/- (approx.) per Equity Share Total Consideration of ₹ 1,86,57,600/- [6,76,000 Locked-in Equity Shares actually inter-se transfer through off-market consisting 5.159%]	Yes On June 28, 2021
8.	Shareholding details	Pre-Transaction	Post-Transaction
		No. of shares held	No. of shares held
		% w.r.t total share capital of TC	% w.r.t total share capital of TC
	a) Each Acquirer / Transferee(*)		
	Mr. Nitinbhai Govindbhai Patel	41,15,000	47,91,000
		31.403	36.561
	b) Each Seller / Transferor		
	Mr. Amitkumar Govindbhai Patel	8,76,400	2,00,400
		6.688	1.529

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.



Nitinbhai Govindbhai Patel
Acquirer (Promoter)

Place: Kadi

Date: July 16, 2021