



Date: June 19, 2025

To,
Securities and Exchange Board of India
Corporation Finance Department
Division of Issues and Listing
SEBI Bhavan Plot No. C4-A, 'G' Block
Bandra Kurla Complex, Bandra (East)
Mumbai 400 051 Maharashtra, India

Sub.: Proposed Initial Public Offering of equity shares of face value Rs.10/- each (the "Equity Shares") of SOBO Films Holding Limited (the "Company") consisting of a fresh issue of the Company (the "Issue");

AND

Application for relaxation in terms of Regulation 300(1)(c) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations") from disclosing Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya, Satindarjit Singh Arora and their Connected Entities (as defined below) as a member of the "promoter group" of our Company in the draft prospectus and the prospectus (collectively called as the "Issue Documents"), in accordance with the SEBI ICDR Regulations (the "Exemption Application").



SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W), Mumbai,
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Definitions

In this Application, except where the context otherwise requires, the following words and expressions shall mean the following meaning:

“Act” shall mean the Companies Act, 2013 and the Companies Act, 1956 (to the extent applicable) and amended from time to time;

“Affidavit” shall mean the affidavits received from the dissenting members for non-association as Promoter group members;

“Application” shall mean this application filed with SEBI;

“Control” shall mean as defined under SEBI ICDR Regulations;

“Connected Entities” shall mean (a) any body corporate in which 20% or more of the equity share capital is held by the Immediate Relatives or a firm or a Hindu Undivided Family (**“HUF”**) in which they are member; and (b) any body corporate in which a body corporate mentioned in (a) above, holds 20% or more of its equity share capital; and (c) any Hindu Undivided Family or firm in which the aggregate share held by our Promoters and their Immediate Relatives is equal to or more than 20% of the equity share capital, shall also qualify to form part of the Promoter Group of our Company.

“Dissenting Members” shall mean members namely; Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya and Satindarjit Singh Arora;

“Draft Prospectus / Prospectus” shall mean the draft prospectus and prospectus to be filed with stock exchange;

“IPO” shall mean the Initial Public offering

“Our Company/ The Company/ Issuer Company” shall mean SOBO Films Holding Limited;

“Promoter” shall mean Smruti Sushilkumar Shinde and Harvinder Singh Arora;

“Promoter Group/Promoter Group Entity” shall mean the immediate relatives and their connected entities as defined under SEBI ICDR Regulations;

“Relaxation/Exemption” shall mean the relaxation and/or exemption sought by the Company from the SEBI for granting exemption under regulation 300 of SEBI ICDR Regulations, 2018 as amended.

“Request Letter” shall mean the letter sent to the individual promoter group members for obtaining the relevant information and documents;

“Subsidiary” shall mean SB Filmz Venturez LLP;

“SEBI ICDR Regulations” shall mean SEBI (Securities and Exchange Board of India) Regulations, 2018 as amended from time to time.





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1. Background

1.1 Our Company was originally incorporated as a Private Limited Company under the Companies Act, 1956 in the name and style of "SOBO Films Holding Private Limited" bearing Corporate Identification Number U73100MH2012PTC225824 dated January 06, 2012, issued by the Registrar of Companies, Mumbai. Subsequently, our Company was converted into public limited Company pursuant to a Special Resolution passed at an Extra-Ordinary General Meeting held on January 10, 2025 and the name of our Company was changed to "SOBO Films Holding Limited" and a fresh Certificate of Incorporation dated January 27, 2025 was issued by Registrar of Companies, Mumbai. As on date of this Application, the Corporate Identification Number of our Company is U73100MH2012PLC225824. Our Company's registered office is located at 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Road, Off Veera Desai Road, Andheri (West), Mumbai- 400 053, Maharashtra, India.

1.2 Our Company i.e. SOBO Films Holding Limited is a dynamic and innovative media production Company based in India, specializing in the creation, development, and production of high-quality television, OTT content & Feature Films. With a focus on storytelling excellence, the Company produces a wide range of TV shows, Web Series & Full format Feature Films across various genres, including drama, comedy, reality, and infotainment, catering to diverse audiences both nationally and internationally.

1.3 Subject to market conditions, receipt of necessary approvals and other considerations, our Company is proposing to undertake the Initial Public Offer. The lead manager to the Issue is Comfort Securities Limited ("**Lead Manager**"). In relation to the Issue, the Company proposes to file the Draft Prospectus (the "**DP**") with SME Platform of BSE Limited ("**BSE SME**") in accordance with the provisions of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("**SEBI ICDR Regulations**").

1.4 As proposed to be disclosed in the Draft Prospectus, the promoters of our Company are Smruti Sushilkumar Shinde and Harvinder Singh Arora (the "**Promoters**"). As on date, they cumulatively hold 80,09,995 Equity Shares in aggregate, representing almost 100.00% of the issued, subscribed and paid-up Equity Share capital of our Company. The shareholding pattern of the Company depicting Promoter, Non-Promoter and Promoter Group shareholding along with their relationship with the Promoters, as on date of this application is enclosed as "**Annexure A**" to this application.

1.5 Identification of Promoter Group:

1.5.1 In connection with the Issue, the SEBI ICDR Regulations require identification of persons and entities as members of its "**promoter group**" in terms of Regulation (2)(1)(pp) of the SEBI ICDR Regulations in its Issue Documents. Consequently, the SEBI ICDR Regulations require certain confirmations / information / undertakings, in relation to the promoter group to be disclosed in the Issue Documents. In terms of Regulation (2)(1)(pp) of the SEBI ICDR Regulations, relation to the Promoters, the individuals and entities forming part of the "**promoter group**", the term "promoter group" has been defined to include the following:

"**Promoter Group**" includes:

- (i) the promoter
- (ii) *an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and*
- (iii) In case promoter is a body corporate:

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- A) a subsidiary or holding company of such body corporate;
B) any body corporate in which the promoter holds twenty per cent. or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter
(iv) *in case the promoter is an individual:*
A. *any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;**
B. *any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;*
C. *any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;*
(v) *all persons whose shareholding is aggregated under the heading "shareholding of the promoter group":*

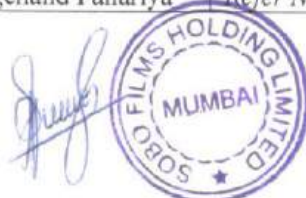
Provided that a financial institution, scheduled bank, foreign portfolio investor other than individuals, corporate bodies and family offices, mutual fund, venture capital fund, alternative investment fund, foreign venture capital investor, insurance company registered with the Insurance Regulatory and Development Authority of India or any other category as specified by the Board from time to time, shall not be deemed to be promoter group merely by virtue of the fact that twenty per cent. or more of the equity share capital of the promoter is held by such person or entity:

Provided further that such financial institution, scheduled bank, foreign portfolio investor other than individuals, corporate bodies and family offices, mutual fund, venture capital fund, alternative investment fund and foreign venture capital investor insurance company registered with the Insurance Regulatory and Development Authority of India or any other category as specified by the Board from time to time shall be treated as promoter group for the subsidiaries or companies promoted by them or for the mutual fund sponsored by them;

1.5.2 In view of the above definition of "Promoter Group", *inter alia*, following relevant person / entities have been identified as part of the promoter group by virtue of being an immediate relative of the promoters and connected entities of the said members of promoters and promoter group members (as mentioned in Clause 1.5.1 of this application):

Relationship with Promoter Smruti Sushilkumar Shinde		Connected Entities	Nature of Interest in Entities
Self	Smruti Sushilkumar Shinde	<ul style="list-style-type: none">SOBO Films Holding LimitedSOBO Films Private LimitedSOBO Infra LLP	Body Corporates in which 20% or more holding is with Promoter.
Father	Sushilkumar Sambhaji Shinde	Refer Note-1	Refer Note-1
Mother	Ujwala Sushilkumar Shinde	Refer Note-1	Refer Note-1
Sister	Priti Raj Shroff	Refer Note-1	Refer Note-1
	Praniti S Shinde	Refer Note-1	Refer Note-1
Brother	Nil	Not Applicable	Not Applicable
Spouse	Sanjay Bhagchand Pahariya	Refer Note-2	Refer Note-2

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Spouse's Father	Late Bhagchand Pahariya	Not Applicable	Not Applicable
Spouse's Mother	Mamta Bhagchand Pahariya	Refer Note-2	Refer Note-2
Spouse's Brother	Rajesh Bhagchand Pahariya	Refer Note-2	Refer Note-2
Spouse's Sister	Nil	Not Applicable	Not Applicable
Son	Veer Pahariya	- Basilius International LLP - Waystar Sports Private Limited	Body Corporates in which 20% or more holding is with Promoter.
	Shikhar Pahariya	- Basilius International LLP - Waystar Sports Private Limited	Body Corporates in which 20% or more holding is with Promoter.
Daughter	Nil	Not Applicable	Not Applicable
Relationship with Promoter Harvinder Singh Arora		Connected Entities	Nature of Interest in Entities
Self	Harvinder Singh Arora	<ul style="list-style-type: none"> SOBO Films Holding Limited Learntalent Consulting Private Limited Rosetta Stone Consulting Services LLP 	Body Corporates in which 20% or more holding is with Promoter.
Father	Late Narindersingh Arora	Not Applicable	Not Applicable
Mother	Gurcharan Kaur Arora	• Ikigai Care LLP	Body Corporates in which 20% or more holding is with Gurucharan Kaur Arora.
		• SB Filmz Venturez LLP	Nominee Designated Partner on behalf of SOBO Films Holding Limited.
Sister	Late Arveen Kaur	Not Applicable	Not Applicable
Brother	Satindarjit Singh Arora	Refer Note-3	Refer Note-3
Spouse	Rushali Arora	• Rosetta Stone Consulting Services LLP	Body Corporates in which 20% or more holding is with Rushali Arora.
		• Target Spot Less	Sole Proprietorship
Spouse's Father	Late Gajanan Bhakaji Risbud	Not Applicable	Not Applicable
Spouse's Mother	Late Indumati Gajanan Risbud	Not Applicable	Not Applicable
Spouse's Brother	Late Bhushan Gajanan Risbud	Not Applicable	Not Applicable

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Spouse's Sister	Nil	Not Applicable	Not Applicable
Son	Nil	Not Applicable	Not Applicable
Daughter	Gia Harvindar Arora (Minor)	Nil	Nil

Note-1: The Company had requested Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Praniti S Shinde and Priti Raj Shroff ("**dissenting members**") to provide the relevant information and documents vide its email request letter dated May 08, 2025 and reminder email requests dated May 15, 2025 and May 19, 2025 however, Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Praniti S Shinde vide an Affidavit dated May 27, 2025 and Priti Raj Shroff vide an Affidavit dated May 28, 2025 had intimated the Company about their unwillingness to be identified as members of promoter group on ground of non-relation with SOBO Films Holding Limited and its Subsidiary i.e. SB Filmz Venturez LLP and strained relationship with the promoter Smruti Sushilkumar Shinde. Thus, information regarding the entities connected with such dissenting members of promoter group is not available with us.

Note-2: The Company had requested Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya and Mamta Bhagchand Pahariya ("**dissenting members**") to provide the relevant information and documents vide its request letter dated May 13, 2025 and reminder requests dated May 20, 2025 by registered posts however, they have not provided any details and documents (including the Affidavit about their unwillingness to be identified as members of promoter group) on ground of strained relationship due to divorce petition filed and pending to be adjudicated between promoter Smruti Sushilkumar Shinde and Sanjay Bhagchand Pahariya. Thus, information regarding the entities connected with such dissenting of promoter group is not available with us.

Note-3: The Company had requested Satindarjit Singh Arora to provide the relevant information, and documents vide its request letter dated May 08, 2025 and reminder requests dated May 15, 2025 and May 19, 2025 however, he has not provided any details and documents (including the Affidavit about his unwillingness to be identified as members of promoter group) on ground of strained relationship between promoter Harvindar Singh Arora and Satindarjit Singh Arora. Thus, information regarding the entities connected with such dissenting of promoter group is not available with us.

1.5.3 The Lead Manager to the Issue, Comfort Securities Limited on behalf of the Company has also requested the dissenting members vide email dated May 23, 2025 to Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Satindarjit Singh Arora and courier dated May 30, 2025 to Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya and Mamta Bhagchand Pahariya for providing the relevant information, declaration and documents however the said dissenting members did not provide the requested details to them.

1.5.4 Ujwala Sushilkumar Shinde was designated partner in subsidiary of the Company i.e. SB Filmz Venturez LLP; however, she resigned as designated partner with effect from February 01, 2023. Further Ujwala Sushilkumar Shinde was holding directorship as non-executive director in the Issuer Company i.e. SOBO Films Holding Limited from September 09, 2015 to January 30, 2023 and was holding 100 (1.00 %) Equity Shares from September 09, 2015 to October 01, 2024. Subsequently as relationship between the promoter and Ujwala Sushilkumar Shinde got strained; Ujwala Sushilkumar Shinde resigned from her post of directorship with effect from January 30, 2023 and transferred equity shares to Smruti Sushilkumar Shinde vide Transfer deed executed on October 01, 2024. However, as on date

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of this application Ujwala Sushilkumar Shinde does not hold any directorship or shareholding or associated as partner in the Company and its Subsidiary.

1.5.5 The dissenting members of promoter group is not associated with any entity in which our promoter Smruti Sushilkumar Shinde or Harvinder Singh Arora are an interested party and further none of the dissenting members of promoter group is associated with any entities forming part of the Promoter group except Satindarjit Singh Arora who is designated partner of the promoter group entity i.e. Ikigai Care LLP in which the Gurucharan kaur Arora is also a designated partner.

1.5.6 The dissenting members of promoter group does not have any control or interest or shareholding in the SOBO Films Holding Limited and its subsidiary i.e. SB Filmz Venturez LLP. Further, none of the dissenting members of promoter group are associated as directors, key managerial personnel, shareholders, vendor, customer or partners / designated partners with the Company or its subsidiaries.

1.5.7 Given that the Company has reached out to the Promoter Group Members namely; Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya and Satindarjit Singh Arora (collectively referred as "**Dissenting Members of Promoter Group**") for obtaining relevant information by sending each of them individual requests letters vide email and / or registered post ("**Company's Request Letters**") enclosed as **Annexure "C-1" to C-8** to this application) but has not received the required information, declarations, clarifications and documents sought from any of them either in their capacity as individual members of the Promoter Group of the Company or entities with which these individuals are associated in any capacity, each in terms of the SEBI (ICDR) Regulations, 2018 as amended time to time. Thus the Company is filing this application for seeking the relaxation as described in paragraph 2 on basis of the grounds of as detailed in paragraph 3.

2. Relaxation Sought

2.1 Regulation 300 of the SEBI ICDR Regulations which provides that SEBI may, in the interest of investors or for the development of the securities market, relax the strict enforcement of any requirement of the SEBI ICDR Regulations, if the SEBI is satisfied that:

- (a) the requirement is procedural in nature; or
- (b) any disclosure requirement is not relevant for a particular class of industry or issuer; or
- (c) the non-compliance was caused due to factors beyond the control of the issuer; and

For the reasons outlined in Paragraph 3 below, our Company will not be able to obtain any details, and the Relevant Persons have refused/expressed unwillingness to give information (including litigations) and confirmations with respect to the Relevant Persons and their Connected Entities. Accordingly, we request you to kindly grant an exemption to our Company in terms of Regulation 300(1)(b) and (c) of the SEBI ICDR Regulations from:

- i. classifying and disclosing the Relevant Persons and their Connected Entities as the Promoter Group of the Company in terms of Regulation 2(1)(pp) of SEBI ICDR Regulations in the Issue Documents and any other documents in relation to the Issue; and
- ii. disclosing information and confirmations with respect to the Relevant Persons and their Connected Entities in the Issue Documents and any other documents in relation to the Issue, as per the requirement under the SEBI ICDR Regulations.

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2.2 This Application is being made by the Company to SEBI (a) for seeking the relaxation from the requirement to include Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya and Satindarjit Singh Arora (hereinafter referred to as "*Dissenting Members*" in the list of members of the Promoter Group of our Company; and (b) the relevant information and confirmations pertaining to the Dissenting Members and their Connected Entities in the Issue Documents, as indicated in paragraph 1.5 above, on the grounds as set forth below in paragraph 3 of this Application.

3. Grounds for seeking exemption

3.1 For Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya and Mamta Bhagchand Pahariya:

Inability to obtain information due to Divorce petition pending between the Promoter (Smruti Sushilkumar Shinde) and her spouse (Sanjay Bhagchand Pahariya)

3.1.1 Promoter Smruti Sushilkumar Shinde and her Spouse Sanjay Bhagchand Pahariya have been residing separately since January 2007. Promoter Smruti Sushilkumar Shinde and Sanjay Bhagchand Pahariya had filed a joint petition for Divorce by Mutual Consent in May 2007 in the Family Court at Bandra, Mumbai which was heard by the Hon'ble Court and an ex-parte order allowing the dissolution of the marriage was passed. Sanjay Bhagchand Pahariya challenged the said ex-parte order in the Hon'ble High Court of Bombay in 2008, and the Hon'ble High Court quashed and set aside the ex-parte order of the Family Court at Bandra, Mumbai that was passed in the year 2007. Subsequently, Promoter Smruti Sushilkumar Shinde filed a Special Leave Petition in the Hon'ble Supreme Court of India and the Hon'ble Supreme Court vide its order remanded the said Divorce Petition back to Family Court at Bandra, Mumbai for reconsideration of the said petition as it was filed afresh. The Hon'ble Family Court at Bandra, Mumbai eventually dismissed the divorce petition as Sanjay Bhagchand Pahariya had refused to give his consent for divorce by mutual consent. To this Promoter Smruti Sushilkumar Shinde again filed a Special Leave Petition in the Hon'ble Supreme Court of India invoking Article 14 and 21 of the Constitution of India which was eventually withdrawn by her with the liberty to pursue her grievance in appropriate proceedings before appropriate forum and hence a fresh divorce petition has been filed by her in the Hon'ble Family Court at Bandra, Mumbai in 2025, seeking dissolution of their marriage and the said petition is pending before the Court as on date of this Application.

3.1.2 Since their separation, both parties i.e. Smruti Sushilkumar Shinde and her Spouse along with Spouse's family have / had no contact with each other and share a strained relationship. As a result, they do not communicate or exchange any information, details or documents between them for any purpose. Furthermore, the relationship between the Smruti Sushilkumar Shinde and her mother-in-law and brother-in-law i.e. Mamta Pahariya and Rajesh Pahariya respectively has also been severely strained since the separation.

3.1.3 As there has been no communication between the Smruti Sushilkumar Shinde and her Spouse along with Spouse's family since their separation, and due to the ongoing legal dispute regarding the divorce petition and absence of mutual trust or cooperation Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya and Mamta Bhagchand Pahariya ("*Dissenting Members*") did not provide any information / documents or affidavit regarding the non-association with promoter group as requested vide registered posts dated May 13, 2025 and reminder request dated May 20, 2025 and May 23, 2025.

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3.1.4 We do not have reference/ Affidavit from the above dissenting members stating in clear terms that the person does not want to be part of the promoter group. Also, no memorandum of understanding duly signed between the Promoter and said relative as on date of submission of this letter. However, it has been certified by the Practicing Chartered Accountant vide its certificate dated May 30, 2025 that these dissenting members have not entered into any financial transactions or related party transactions with SOBO Films Holding Limited including its subsidiary SB Filmz Venturez LLP, either directly or indirectly, in the preceding 3 (three) Financial Years.

3.2 For Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde:

Inability to obtain information due to unwillingness to be a part of Promoter Group:

3.2.1 Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, do not have any shareholding in the Company or its subsidiary nor are they directors on the board of the Company or the subsidiary. Further they do not have any role in the management, business or operations of the Company and its subsidiary.

3.2.2 Our Promoter Smruti Sushilkumar Shinde and her relatives namely Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde does not have any kind of influence or control over each other or in their connected business entities in any manner. Further it has been certified by the Practicing Chartered Accountant vide its certificate dated May 30, 2025 that these dissenting members have not entered into any financial transactions or related party transactions with SOBO Films Holding Limited including its subsidiary SB Filmz Venturez LLP, either directly or indirectly, in the preceding 3 (three) Financial Years.

3.2.3 The Company has, by way of email request letters dated May 08, 2025 and further by reminder email requests sent individually dated May 15, 2025 and May 19, 2025 and requested all the aforesaid persons to provide relevant information and confirmations required under the SEBI ICDR Regulations in respect of them being classified and disclosed as a part of the Promoter Group of the Company. However, after the multiple requests and efforts made by our promoters for obtaining the relevant information to be disclosed in Issue documents, Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde ("**Dissenting Members**") refused the disclosure, of themselves and any entities with whom they are associated and have refused to provide the required information and confirmations sought by the Company for the purpose of disclosing them as a member of the Promoter Group of the Company in the proposed Draft Prospectus / Issue Documents.

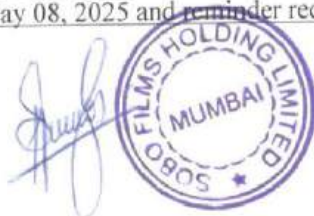
3.2.4 After the intimation of above stated refusal, the Promoters and Company had further requested the Dissenting Members to provide an affidavit confirming their intention to remain disassociated from the Company as members of the Promoter Group, so as to enable the Company to make this application to SEBI, for seeking exemption from disclosure of the Dissenting Members and any entities with whom they are associated, as members of the Promoter Group of the Company ("**Affidavits**" – enclosed as "**Annexure D-1 to D-4**").

3.3. For Satindarjit Singh Arora

Inability to obtain information due to unwillingness to be a part of Promoter Group:

3.3.1 The Company has requested the brother of Promoter Harvinder Singh Arora i.e Satindarjit Singh Arora vide email dated May 08, 2025 and reminder requests dated May 15, 2025 and May 19, 2025 for

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providing the relevant details, documents, declarations and clarifications to be included in the Issue documents to be filed with the Stock Exchange, further the promoter Harvinder Singh Arora has personally requested the said dissenting member to provide the above stated details as described in the request letter. However Mr. Satindarjit Singh Arora has refused and unwilling to provide any details, documents, declarations and clarifications as requested to him and he is further not willing to provide any affidavits for non-association as promoter group with the Company. Further the Promoter Harvinder Singh Arora does not have any influence or control over Satindarjit Singh Arora or his connected entities in any manner and vice versa.

3.3.2 We do not have reference/ Affidavit from the above dissenting members stating in clear terms that the person does not want to be part of the promoter group. Also, no memorandum of understanding duly signed between the Promoter and said relative as on date of submission of this letter. However, it has been certified by the Practising Chartered Accountant vide its certificate dated May 30, 2025 that these dissenting members have not entered into any financial transactions or related party transactions with SOBO Films Holding Limited including its subsidiary SB Filmz Venturez LLP, either directly or indirectly, in the preceding 3 (three) Financial Years.

3.4. Against the aforesaid background, kindly consider the following respectful submissions:

3.4.1 All the dissenting members do not (directly or indirectly) have any role in the management, business or operations of SOBO Films Holding Limited or its subsidiary SB Filmz Venturez LLP.

3.4.2 All the dissenting members are not associated with any of the entities forming a part of the promoter group of SOBO Films Holding Limited except Satindarjit Singh Arora who is designated partner of the promoter group entity i.e. Ikigai Care LLP in which the Gurucharan kaur Arora is also a designated partner..

3.4.3 All the dissenting members do not hold any directorship / partnership / shareholding in SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company nor do they have any representative on the board of directors of SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company.

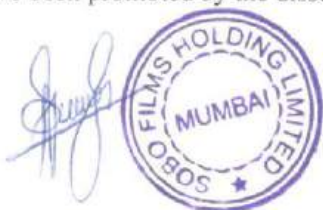
3.4.4 All the dissenting members do not hold any equity shares or securities of any other class of SOBO Films Holding Limited nor are they a vendor or a supplier or a client of SOBO Films Holding Limited or any of its subsidiaries.

3.4.5 As on date of this letter, all the dissenting members of promoter group do not have any related party transactions with SOBO Films Holding Limited or its subsidiary and do not have any special rights with respect to SOBO Films Holding Limited or its subsidiary through any formal or informal arrangements.

3.4.6 Based on Certificate obtained from Practising Chartered Accountant Firm vide its letter dated May 30, 2025, that the dissenting members have not entered into any financial transactions or related party transactions with SOBO Films Holding Limited including its subsidiary SB Filmz Venturez LLP, either directly or indirectly, in the preceding 3 (three) Financial Years.

3.4.7 Our Company its Subsidiary and our Promoter does not hold, directly or indirectly, any securities in any ventures that have been promoted by the dissenting members.

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SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W), Mumbai.

MH - 400 053, IN, Tel. No:-+91 22 40227111 / 40327113

3.4 Accordingly, each of the Dissenting Members have indicated that they are not agreeable to take on any legal obligation nor would they like to be associated with the Issue or the Company now or in the future as a member of the promoter group of the Company or in any other manner. Further, they do not wish the disclosure of their name, their relatives or any entities with whom they are associated in any Issue related document issued by the Company with respect to the Issue, whether as a member of the promoter group of the Company or otherwise. Further, they have declined to consent to the inclusion of their name or that of their relatives or any entities in which they are interested in any document or regulatory filing made by the Company in respect of the Issue or subsequent thereto.

3.5 Accordingly, our Company is unable to comply with the requirements prescribed under the SEBI ICDR Regulations and other application provisions of the SEBI ICDR Regulations, with respect to providing confirmations / information to be disclosed in the Draft Prospectus and Issue Documents in relation to the Dissenting Members as members of the 'promoter group' as defined under Regulation 2(1)(pp)(iv) of the SEBI ICDR Regulations, due to the aforesaid factors, which are beyond its control.

3.6 In the interest of transparency and adequate disclosure, the exclusion of the Dissenting Members and the Connected Entities associated with them as a part of the Promoter Group of our Company, will be disclosed through a risk factor *"The Promoter Group does not include certain individuals relatives of the Promoters or any entity in which they may have an interest"*. We will ensure that this risk factor continues to appear in the Draft Prospectus and the Prospectus. Further, the Company will include a disclosure to the effect that the list of members of the Promoter Group of our Company does not include the Dissenting Members, or any Connected Entity(ies) on which they may have interest, at appropriate places in the Issue Documents.

3.7 Accordingly, we request you to kindly grant us a relaxation in terms of Regulations 300(1) of the SEBI ICDR Regulations for:

3.7.1 Exempting disclosure of names of all the Dissenting Members namely, Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya, Satindarjit Singh Arora and their Connected Entities from being classified and disclosed as members of the "Promoter Group", in terms of SEBI ICDR Regulations, in the Issue Documents; and

3.7.2 Not disclosing information and confirmations with respect to all the Dissenting Members namely, Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya and Satindarjit Singh Arora and their Connected Entities in the Issue Document, required under the SEBI ICDR Regulations.

4. In accordance with Regulation 300(3) of the SEBI ICDR Regulations, our Company has made a non-refundable fee payment of ₹ 1,00,000/- (Rupees One Lakh only) through SEBI Online Payment Facility via Net Banking mode which has been directly credited to SEBI's bank account vide Receipt Number: BHDF89W0NXVD58.

4.1 We request you to kindly keep the contents of this Application confidential.

4.2 We trust the information included in this Application meets your application requirements and look forward to receiving your approval.

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SOBO FILMS HOLDING LIMITED



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4.3 Should you require any clarification; we request you to contact the following representatives of our Company:

Contact Person	Telephone Number	Email
Harvinder Singh Arora (CEO and Director) DIN: 00802852	+91 22 40227111 / 40227113	compliance@sobofilms.com

Thanking you.

Yours faithfully,

For SOBO Films Holding Limited

Harvinder Singh Arora

DIN: 00802852

Designation: CEO and Director

Email: compliance@sobofilms.com

Telephone no.: +91 22 40227111 / 40227113



Shareholding pattern as on 19.06.2025 - SOBO Films Holding Limited

Sr. No.	Name of Shareholder	Promoter	Promoter Group	Non-Promoter	Relationship with promoter	No. of Equity Shares	% of Total Shareholding
1.	Smruti Sushilkumar Shinde	✓	NA	NA	NA	52,07,300	65.01%
2.	Harvinder Singh Arora	✓	NA	NA	NA	28,02,695	34.99%
Total Shareholding Promoters (A)						80,09,995	100.00%
3.	Jawahar Sharma	NA	NA	✓	No-Relation	1	Negligible
4.	Mithilesh Mishra	NA	NA	✓	No-Relation	1	Negligible
5.	Amol Kshirsagar	NA	NA	✓	No-Relation	1	Negligible
6.	Aparna Bhosale	NA	NA	✓	No-Relation	1	Negligible
7.	Avinash Wadhwani jointly holding with Monica Avinash Wadhwani	NA	NA	✓	No-Relation	1	Negligible
Total Shareholding Non-Promoters and Non-Promoter Group (B)						5	Negligible
Total Shareholding (A+B)						80,10,000	100.00%

Note: Except Promoters, no other members of Promoter Group including the dissenting members of promoter group hold any share in the Company.





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Annexure B

PROMOTER GROUP MEMBERS

Relationship with Promoter Smruti Sushilkumar Shinde		Affidavit for non-association	SEBI Exemption Requested
Father	Sushilkumar Sambhaji Shinde*	✓	✓
Mother	Ujwala Sushilkumar Shinde*	✓	✓
Sister	Priti Raj Shroff*	✓	✓
	Praniti S Shinde*	✓	✓
Brother	Nil	NA	NA
Spouse	Sanjay Bhagchand Pahariya*	×	✓
Spouse's Father	Late Bhagchand Pahariya	NA	NA
Spouse's Mother	Mamta Bhagchand Pahariya*	×	✓
Spouse's Brother	Rajesh Bhagchand Pahariya*	×	✓
Spouse's Sister	Nil	NA	NA
Son	Veer Sanjay Pahariya	NA	NA
	Shikhar Sanjay Pahariya	NA	NA
Daughter	Nil	NA	NA
Relationship with Promoter Harvinder Singh Arora		Affidavit for non-association	SEBI Exemption Requested
Father	Late Narindersingh Arora	NA	NA
Mother	Gurcharan Kaur Arora	NA	NA
Sister	Late Arveen Kaur	NA	NA
Brother	Satinderjit Singh Arora*	×	✓
Spouse	Rushali Arora	NA	NA
Spouse's Father	Late Gajanan Bhakaji Risbud	NA	NA
Spouse's Mother	Late Indumati Gajanan Risbud	NA	NA
Spouse's Brother	Late Bhushan Gajanan Risbud	NA	NA
Spouse's Sister	Nil	NA	NA
Son	Nil	NA	NA
Daughter	Gia Harvinder Arora (Minor)	NA	NA

**Dissenting members of Promoter Group*





Date: May 15, 2025

To,
Sushilkumar Sambhaji Shinde
16, Gautam Apartment 72,
Pali Hill, Bandra West, Mumbai,
Maharashtra – 400050
Email: sushilkumar.shinde@gmail.com

Dear Sushilkumar Sambhaji Shinde,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "promoter group" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde's father.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W)

Mumbai, MH- 400 053, IN. Tel: No. +91 22 40227111 / 40327112



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In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.
Email: compliance@sobofilms.com


We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited


Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, M-400 053, IN. Tel. No. +91 22 40227111 / 40327113



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Date: May 15, 2025

To,
Ujwala Sushilkumar Shinde
16, Gautam Apartment 72,
Pali Hill, Bandra West, Mumbai,
Maharashtra – 400050
Email: shindeujjawala71@gmail.com

Dear Ujwala Sushilkumar Shinde,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the “Company”)

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India (“SEBI”) and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the “SEBI ICDR Regulations”), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of “promoter group” of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

“Promoter Group” includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading “shareholding of the promoter group”.

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde’s mother.

SOBO FILMS HOLDING LIMITED

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Mumbai, MH – 400 053, IN. Tel. No. +91 22 40227111 / 40327113



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In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.

Email: compliance@sobofilms.com

We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited

Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai MH - 400 053. IN. Tel. No.: +91 22 40227111 / 40327113



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Date: May 15, 2025

To,
Praniti Shinde
19, Ashok Nagar, Vijapur Road,
Solapur South, Solapur,
Maharashtra – 413004
Email: pranitishinde@gmail.com

Dear Praniti Shinde,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "promoter group" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde's sister.

SOBO FILMS HOLDING LIMITED

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Mumbai, MH - 400 053, Tel. No: +91 22 40227111 / 40327113



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In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.
Email: compliance@sobofilms.com

We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited


Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
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Mumbai, MH - 400 053, IN, Tel. No. +91 22 40227111 / 40227113



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Date: May 08, 2025

To,
Priti Raj Shroff
Villa ORB, 5th Floor, Darabshaw Lane,
Nepean Sea Road, Opp St Stephens Church,
Cumballa Hill, Mumbai, Maharashtra - 400026
Email: pritishroff@charak.com

Dear Priti Raj Shroff,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "**SEBI ICDR Regulations**"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "**promoter group**" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"**Promoter Group**" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde's sister.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, MH - 400 053, IN. Tel. No: +91 22 40227111 / 40327113



**BREWING
BOLD
ENTERTAINMENT**

In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.

Email: compliance@sobofilms.com

We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited


Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, MH - 400 053, IN. Tel. No: +91 22 40227111 / 40327113



**BREWING
BOLD
ENTERTAINMENT**

Date: May 13, 2025

To,
Sanjay Bhagchand Pahariya
Beau Monde, C Tower, 26th Floor,
Appasaheb Marathe Marg, Prabhadevi,
Mumbai, Maharashtra - 400025
Email:

Dear Sanjay Bhagchand Pahariya,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvindar Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "promoter group" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde's Spouse.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattoji Salvi Marg, Off Veera Desai Road, Andheri (W)

Mumbai, MH - 400 053, IN, Tel. No: +91 22 40227111 / 40327113



**BREWING
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ENTERTAINMENT**

In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names and copies of PAN of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.
Email: compliance@sobofilms.com


We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited


Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W)
Mumbai, MH - 400 053, IN. Tel. No.: +91 22-40227111 / 40327113



**BREWING
BOLD
ENTERTAINMENT**

Date: May 13, 2025

To,
Mamta Bhagchand Pahariya
(C/O Sanjay Bhagchand Pahariya)
Beau Monde, C Tower, 26th Floor,
Appasaheb Marathe Marg, Prabhadevi,
Mumbai, Maharashtra - 400025
Email:

Dear Mamta Bhagchand Pahariya,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "promoter group" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being her Spouse's Mother i.e. Mother-in-Law of Smruti Sushilkumar Shinde.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: **U73100MH2012PLC225824**
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, MH - 400 053 IN. Tel No: +91 22 40227111 / 40327113



**BREWING
BOLD
ENTERTAINMENT**

In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.

Email: compliance@sobofilms.com

We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you.

Yours faithfully,

For **SOBO Films Holding Limited**

Harvinder Singh Arora

CEO and Director

DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),

Mumbai, MH- 400 053, IN. Tel. No. +91 22 40227111 / 40327111



**BREWING
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ENTERTAINMENT**

Date: May 13, 2025

To,
Rajesh Bhagchand Pahariya
Beau Monde, C Tower, 26th Floor,
Appasaheb Marathe Marg, Prabhadevi,
Mumbai, Maharashtra - 400025
Email:

Dear Rajesh Bhagchand Pahariya,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "SEBI ICDR Regulations"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Smruti Sushilkumar Shinde and Harvinder Singh Arora in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "promoter group" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Smruti Sushilkumar Shinde's Brother In Law.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, MH - 400 053, IN, Tel. No. +91 22 40227111 / 40327113



**BREWING
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ENTERTAINMENT**

In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names and copies of PAN of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding 20% or more of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Harvinder Singh Arora

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.
Email: compliance@sobofilms.com

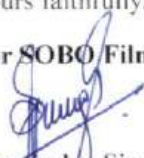
We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited


Harvinder Singh Arora
CEO and Director
DIN: 00802852

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
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Mumbai, MH - 400 053. IN. Tel. No. +91 22 40227111 / 40327113



**BREWING
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ENTERTAINMENT**

Date: May 08, 2025

To,
Satindarjit Singh Arora
267, Sector – 9 – C,
Chandigarh, Sector – 9,
Chandigarh – 160009.
Email: ssarora.597@gmail.com

Dear Satindarjit Singh Arora,

Sub: Request to provide information as a member of promoter group of SOBO Films Holding Limited (the "Company")

The Company is proposing an initial public offering pursuant to which the Company is in the process of filing its Issue document with the Securities Exchange Board of India ("SEBI") and Stock Exchange(s). As part of this process, the Company is required to comply with certain disclosure requirements under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "**SEBI ICDR Regulations**"), provisions under Companies Act, 2013, and rules made thereunder and other applicable law.

Harvinder Singh Arora and Smruti Sushilkumar Shinde in their individual capacity have been identified as Promoters of the Company. Under Regulation 2(1)(pp) of SEBI ICDR Regulations, the definition of "**promoter group**" of an issuer company proposing an initial public offering has been provided for which is reproduced herein below:

"Promoter Group" includes:

- (i) the promoter;
- (ii) an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse); and
- (iii) in case promoter is a body corporate:
 - A. a subsidiary or holding company of such body corporate;
 - B. any body corporate in which the promoter holds twenty percent or more of the equity share capital; and/or any body corporate which holds twenty per cent. or more of the equity share capital of the promoter;
- (iv) in case the promoter is an individual:
 - A. any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;
 - B. any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and;
 - C. any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital;
- (v) all persons whose shareholding is aggregated under the heading "shareholding of the promoter group".

In light of regulation 2(1)(pp) of the SEBI ICDR Regulation, yourself and any other entity related to you by way of your shareholding (as specified in Regulation 2(1)(pp) of SEBI ICDR Regulations) will be identified as a member of the proposed promoter group of the Company as you are an immediate relative of our promoter, being Harvinder Singh Arora's brother by relation.

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai MH - 400 053, IN. Tel No: +91 22 40227111 / 40327113



**BREWING
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ENTERTAINMENT**

In this regard, we request you to provide the information and confirmations as per the format attached as "Annexure A" and also request you to provide us names of the companies/LLP/partnership firms/Trusts/HUFs/other entities wherein you individually or along with your immediate relative are holding more 20% of the shareholding or beneficial interest in such companies/LLP/partnership firms/Trusts/HUFs/other entities. Please read the format carefully and completely, including the various notes contained therein.

If you do not wish to remain a member of the promoter group of the Company, please send an executed draft of the affidavit format attached herewith as Annexure B to the below mentioned address immediately, by registered post or electronically, clearly stating that you are unwilling to remain a member of the promoter group of the Company. Please note that as per extant law, you are currently a member of the promoter group of the Company. Please note that post receipt of such affidavit, your exclusion from the promoter group of the Company will remain subject to approvals, including approval of SEBI.

Further please also send a copy of your PAN Card, Aadhaar Card, Passport, Tax Demand Screenshots, to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

SOBO Films Holding Limited

Smruti Sushilkumar Shinde

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.
Email: compliance@sobofilms.com

We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in the draft prospectus (the "DP"), and the prospectus (the "Prospectus" and together the "Issue Documents") of the Company and the disclosures/confirmations with respect to you shall be made in the Issue Documents to be filed with SEBI, the Registrar of Companies, Mumbai at Maharashtra and the stock exchanges where the Company proposes to list its Equity Shares. In this regard, you will be required to provide an executed draft of the certificate attached here as Annexure A capturing all the information and confirmations required from you as a member of the promoter group of the Company.

You are kindly requested to do the needful at the earliest.

Should you need any clarification on the certificate or with respect to any provisions of the SEBI ICDR Regulations, kindly revert.

Thanking you,
Yours faithfully,

For SOBO Films Holding Limited

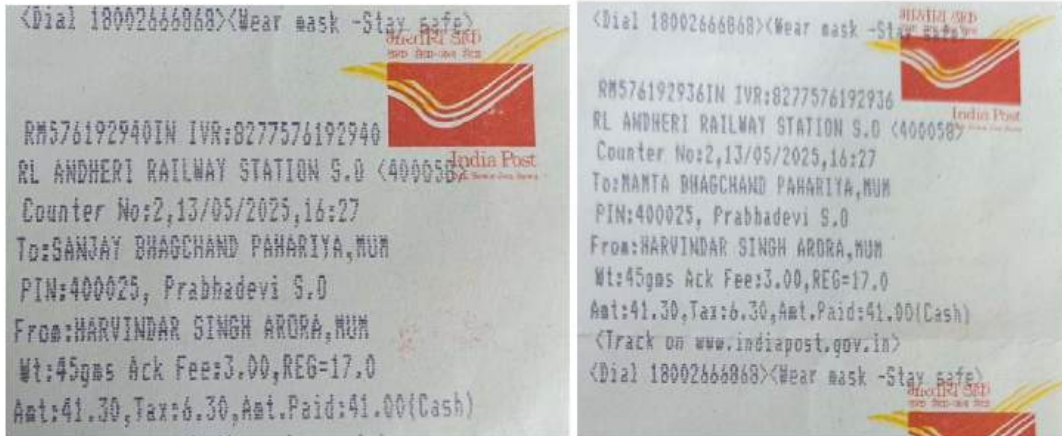
Smruti Sushilkumar Shinde
Chairperson & Managing Director
DIN: 03185327

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824
Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W),
Mumbai, MH - 400 053, IN. Tel. No: +91 22 40227001 / 40327003

Courier charges Records

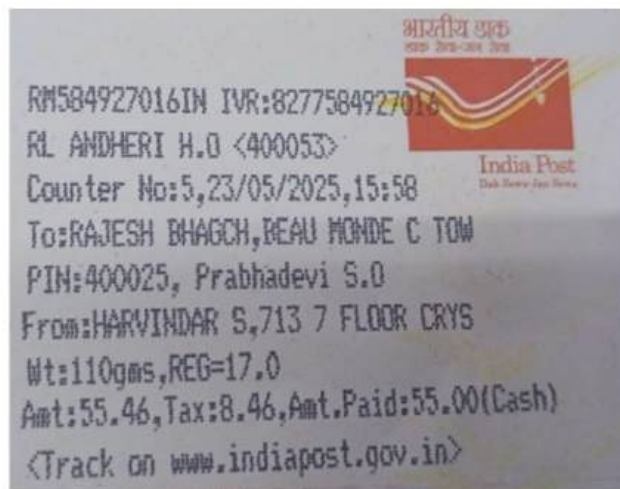
1. Request Letter from SOBO Films Holding Limited Registered Post Dated – May 13, 2025



2. Reminder 1 from SOBO Films Holding Limited Registered Post Dated – May 20, 2025.



3. Reminder 2 from SOBO Films Holding Limited Registered Post Dated – May 23, 2025.



4. Letter to PG Member - Priti Shroff.

On Thu, May 8, 2025 at 4:14 PM compliance Sobo Films <compliance@sobofilms.com> wrote:

Dear Priti Shroff,

Hope this email finds you well;

We, **SOBO Films Holding Limited** are planning to raise funds through initial public offering (IPO) as per SEBI ICDR Regulations and we shall be filing the draft prospectus/prospectus with Stock Exchange and Registrar of Companies.

Accordingly you have been identified as a member of the promoter group by virtue of being an immediate relative to our Promoter Smruti Sushilkumar Shinde, as prescribed under SEBI ICDR Regulations.

We request you to read the attached letters and provide us the requisite details and documents as stated in "Annexure A" along with signed consent of name inclusion as member of promoter group in the draft prospectus and signed confirmation regarding whether the watchouts search pertains to you or not. *(All on your individual personal letterhead)*

In case you do not wish to be part of the member of the promoter group, please provide a notarized affidavit as attached in "Annexure B" along with the grounds of the non-inclusion. *(on Rs. 500 Stamp paper)*

Kindly note that said exclusion of Promoter group member name in draft prospectus is at discretion of the SEBI, thus in case we fail to get an exemption from the SEBI your name will be stated in draft prospectus as dissenting member.

Request you to read the letter carefully and do the needful, in case you require any further information please contact on the below number:

Name: Harvinder Singh Arora
Director and CEO
Contact No: +91 98203 00110

5. Letter to PG Member - Ujwala Sushilkumar Shinde.

On Thu, May 15, 2025 at 12:38 PM compliance Sobo Films <compliance@sobofilms.com> wrote:

Dear Ujwala Shinde Mam,

Hope this email finds you well;

We, **SOBO Films Holding Limited** are planning to raise funds through initial public offering (IPO) as per SEBI ICDR Regulations and we shall be filing the draft prospectus/prospectus with Stock Exchange and Registrar of Companies.

Accordingly you have been identified as a member of the promoter group by virtue of being an immediate relative to our Promoter Smruti Sushilkumar Shinde, as prescribed under SEBI ICDR Regulations.

We request you to read the attached letters and provide us the requisite details and documents as stated in "Annexure A" along with signed consent of name inclusion as member of promoter group in the draft prospectus and signed confirmation regarding whether the watchouts search pertains to you or not. *(All on your individual personal letterhead)*

In case you do not wish to be part of the member of the promoter group, please provide a notarized affidavit as attached in "Annexure B" along with the grounds of the non-inclusion. *(on Rs. 500 Stamp paper)*

Kindly note that said exclusion of Promoter group member name in draft prospectus is at discretion of the SEBI, thus in case we fail to get an exemption from the SEBI your name will be stated in draft prospectus as dissenting member.

Request you to read the letter carefully and do the needful, in case you require any further information please contact on the below number:

Name: Harvinder Singh Arora
Director and CEO
Contact No: +91 98203 00110

6. Letter to PG Member - Praniti S Shinde.

On Thu, May 15, 2025 at 12:37 PM compliance Sobo Films <compliance@sobofilms.com> wrote:

Dear Praniti Shinde,

Hope this email finds you well;

We, **SOBO Films Holding Limited** are planning to raise funds through initial public offering (IPO) as per SEBI ICDR Regulations and we shall be filing the draft prospectus/prospectus with Stock Exchange and Registrar of Companies.

Accordingly you have been identified as a member of the promoter group by virtue of being an immediate relative to our Promoter Smruti Sushilkumar Shinde, as prescribed under SEBI ICDR Regulations.

We request you to read the attached letters and provide us the requisite details and documents as stated in "Annexure A" along with signed consent of name inclusion as member of promoter group in the draft prospectus and signed confirmation regarding whether the watchouts search pertains to you or not. *(All on your individual personal letterhead)*

In case you do not wish to be part of the member of the promoter group, please provide a notarized affidavit as attached in "Annexure B" along with the grounds of the non-inclusion. *(on Rs. 500 Stamp paper)*

Kindly note that said exclusion of Promoter group member name in draft prospectus is at discretion of the SEBI, thus in case we fail to get an exemption from the SEBI your name will be stated in draft prospectus as dissenting member.

Request you to read the letter carefully and do the needful, in case you require any further information please contact on the below number:

Name: Harvinder Singh Arora
Director and CEO
Contact No: +91 98203 00110

7. Letter to PG Member - Sushilkumar Shinde.

On Thu, May 15, 2025 at 12:35 PM compliance Sobo Films <compliance@sobofilms.com> wrote:

Dear Sushilkumar Shinde Sir,

Hope this email finds you well;

We, **SOBO Films Holding Limited** are planning to raise funds through initial public offering (IPO) as per SEBI ICDR Regulations and we shall be filing the draft prospectus/prospectus with Stock Exchange and Registrar of Companies.

Accordingly you have been identified as a member of the promoter group by virtue of being an immediate relative to our Promoter Smruti Sushilkumar Shinde, as prescribed under SEBI ICDR Regulations.

We request you to read the attached letters and provide us the requisite details and documents as stated in "**Annexure A**" along with signed consent of name inclusion as member of promoter group in the draft prospectus and signed confirmation regarding whether the watchouts search pertains to you or not. *(All on your individual personal letterhead)*

In case you do not wish to be part of the member of the promoter group, please provide a notarized affidavit as attached in "**Annexure B**" along with the grounds of the non-inclusion. *(on Rs. 500 Stamp paper)*

Kindly note that said exclusion of Promoter group member name in draft prospectus is at discretion of the SEBI, thus in case we fail to get an exemption from the SEBI your name will be stated in draft prospectus as dissenting member.

Request you to read the letter carefully and do the needful, in case you require any further information please contact on the below number:

Name: Harvinder Singh Arora
Director and CEO
Contact No: +91 98203 00110

8. Letter to PG Member – Satindrajit Singh Arora.

On Thu, May 8, 2025 at 5:21 PM compliance Sobo Films <compliance@sobofilms.com> wrote:

Dear Satindrajit Singh Arora,

Hope this email finds you well;

We, **SOBO Films Holding Limited** are planning to raise funds through initial public offering (IPO) as per SEBI ICDR Regulations and we shall be filing the draft prospectus/prospectus with Stock Exchange and Registrar of Companies.

Accordingly you have been identified as a member of the promoter group by virtue of being an immediate relative to our Promoter Harvinder Singh Arora, as prescribed under SEBI ICDR Regulations.

We request you to read the attached letters and provide us the requisite details and documents as stated in "**Annexure A**" along with signed consent of name inclusion as member of promoter group in the draft prospectus and signed confirmation regarding whether the watchouts search pertains to you or not. *(All on your individual personal letterhead)*

In case you do not wish to be part of the member of the promoter group, please provide a notarized affidavit as attached in "**Annexure B**" along with the grounds of the non-inclusion. *(on Rs. 500 Stamp paper)*

Kindly note that said exclusion of Promoter group member name in draft prospectus is at discretion of the SEBI, thus in case we fail to get an exemption from the SEBI your name will be stated in draft prospectus as dissenting member.

Request you to read the letter carefully and do the needful, in case you require any further information please contact on the below number:

Name: Harvinder Singh Arora
Director and CEO
Contact No: +91 98203 00110

9. Reminder Letter to the PG Members – All

<input type="checkbox"/> ☆ compliance, Alok 2	Inbox	Re: Letter to PG Member - Priti Shroff - compliance@sobofilms.com> wrote: > Dear Priti Shroff, >> Gentle Reminder. >> Request you to provide	May 23
<input type="checkbox"/> ☆ compliance, Alok 2	Inbox	Re: Letter to PG Member - Ujwala Shinde - compliance@sobofilms.com> wrote: > Dear Ujwala Shinde Mam, >> Gentle Reminder. >> Request you to	May 23
<input type="checkbox"/> ☆ compliance, Alok 2	Inbox	Re: Letter to PG Member - Praniti Shinde - compliance@sobofilms.com> wrote: > Dear Praniti Shinde, >> Gentle Reminder. >> Request you to provide	May 23
<input type="checkbox"/> ☆ compliance, Alok 3	Inbox	Re: Letter to PG Member - Sushilkumar Shinde - compliance@sobofilms.com> wrote: > Dear Sushilkumar Shinde Sir, >> Gentle Reminder. >> Request	May 23

10. Reminder Letter to the PG Members – Sanjay Bhagchand Pahariya, Mamta Bhagchand Pahariya and Rajesh Pahariya.

		DTDC Express Limited Regd. Office: No-3, Victoria Road Bengaluru - 560047		ORIGIN	DEST.
POUCH NO.		DATE 20/05/24		Download MyDTDC app 	
Non Negotiable Consignment Note / Subject to Bengaluru Jurisdiction.					
1 Sender's (Consignor) Name: <u>Amfora semite</u> Ph: _____ Company Name & Address: _____ City: _____ State: _____ PIN Code: _____ Sender's GSTIN*: _____			2 Recipient's (Consignee) Name: <u>Sanjay Bhagchand</u> Ph: _____ Company Name & Address: _____ City: <u>Mumbai</u> State: <u>Maharashtra</u> PIN Code: <u>400025</u> Recipient's GSTIN*: _____		
3 Nature of consignment (✓) <input checked="" type="checkbox"/> Dox <input type="checkbox"/> Non-Dox <input type="checkbox"/> Total Num Pcs: <u>01</u> DIM 1: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Actual Wt.: _____ kg DIM 2: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Volumetric Wt.: _____ kg DIM 3: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Chargeable Wt.: <u>1kg</u>			4 Description of Content _____ Total Value of consignment for carriage / S-Way bill: ₹ _____		
5 Paper Work Enclosures _____			6 Type of consignment (✓) <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Non Commercial <input type="checkbox"/> 7 Value Added Services <input type="checkbox"/> Net Available: _____ CN Expiry Date: _____		
10 I/We declare that this consignment does not contain personal mail, cash, jewellery, contraband, illegal drugs, any prohibited items and commodities which can cause safety hazards while transporting			9 Charges Amount(₹) a) Tariff (incl. OF PSC + Taxes) _____ b) Risk Surcharge _____ c) Total amount (a+b) <u>100/-</u> Above charges are in disson of GST & other taxes if applicable. Mode of Payments Cash <input type="checkbox"/> Card <input type="checkbox"/> Wallet <input type="checkbox"/>		
Sender's Signature & Seal _____ Date: _____ Time: _____ AM/PM I have read and understood terms & conditions printed overleaf of this consignment note and I agree to the same.			8 Mode (✓) <input checked="" type="checkbox"/> Surface <input type="checkbox"/> Air Cargo <input type="checkbox"/> Express <input type="checkbox"/> Consignment Number:  M51026435 11 Booking Branch / Franchisee Code _____ 12 Risk Surcharge _____ Owner _____ Carrier _____		
http://www.dtdc.in customersupport@dtcd.com +91-9606 911 811 SENDER COPY Jan. 2024					



महाराष्ट्र MAHARASHTRA



Annexure B

AFFIDAVIT

DC 566205
प्रधान मुद्रांक कार्यालय, मुंबई
प.मु.वि.क्र. ८००००९५
- 6 MAY 2025
सक्षम अधिकारी

श्री. जे. पी. वाईकर

I, Sushilkumar Sambhaji Shinde, Father of Smruti Sushilkumar Shinde aged about 83 years, presently residing at 16, Gautam Apartment 72, Pali Hill, Bandra West, Mumbai, Maharashtra - 400050 do hereby solemnly affirm and declare as under:

1. I am the Father of Smruti Sushilkumar Shinde.
2. By way of a letter dated 06 May 2025, I have been informed that SOBO Films Holding Limited is proposing an initial public offering ("Issue"). I am unwilling to be identified, categorized and/or disclosed as a member of the promoter group of SOBO Films Holding Limited by virtue of being an immediate relative of Smruti Sushilkumar Shinde, the promoter of SOBO Films Holding Limited under the requirements prescribed in Regulations 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended time to time.
3. I am unwilling to identify, categorize and disclose any entity related to me by way of my shareholding (as specified in Regulation 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018 as amended in the particular entity as a member of the promoter group of SOBO Films Holding Limited.

15 MAY 2025

002433

002

जीड-4-9 Annexure -
प्रतिज्ञापत्रासाठी Only for Affidavit
मुद्रांक विकत घेणाऱ्याचे नाव Suyhikumar S. Shinde
मुद्रांक विकत घेणाऱ्याचे रहिवासी पत्ता _____ दिनांक _____
मुद्रांक विकत घेणाऱ्याची वीस वी असु. क्रमांक _____

15 MAY 2025

मुद्रांक विकत घेणाऱ्याची
घरवार्ता क्रमांक 60000094
मुद्रांक विक्रीचे विज्ञापन/पत्र अंधेरी मीट वार असोसिएशन
एम एम घोडे, अंधेरी पूर्व स्टेशनच्या बाजूला, अंधेरी (पूर्व), मुंबई
शासकीय कार्यालय, एम.ए. वि. वि. कार्यालय, प्रतिज्ञापत्र सादर कर गेसाठी मुद्रांक
वसुधायी आवश्यकता साठी (मुद्रांक अर्जा दि. 09/09/2008) नुसार
ज्या कारणासाठी ज्यांनी मुद्रांक खरेदी केला त्यांनी त्याच कारणासाठी मुद्रांक खरेदी
केल्यापासून सहा महिन्यात याप्रमाणे बंधनकारक आहे.



4. In light of the above, I am unwilling to provide or confirm any information or statements or undertakings or confirmations pertaining to myself and any entity related to me for inclusion /disclosure in the draft prospectus and the prospectus or any other material or documents in relation to the Issue ("**Issue Documents**") or for submission to any stock exchange and/or statutory authority or any other person connected with the Issue.
5. I do not (directly or indirectly) have any role in the management, business or operations of SOBO Films Holding Limited or its subsidiary nor in any of the entities forming a part of the promoter group of SOBO Films Holding Limited (as identified in the Issue Documents). I am not on the board of directors SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company (as identified in the Issue Documents) nor do I have any representative on the board of directors of SOBO Films Holding Limited. I do not hold any equity shares or securities of any other class of SOBO Films Holding Limited nor am I a vendor or a supplier or a client of SOBO Films Holding Limited or any of its subsidiaries. Further, as on date, I do not have any related party transactions with SOBO Films Holding Limited and do not have any special rights with respect to SOBO Films Holding Limited through any formal or informal arrangements.
6. I have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by SOBO Films Holding Limited including the Securities and Exchange Board of India and confirm that this affidavit may be relied upon by SOBO Films Holding Limited, and any advisors and other parties appointed by SOBO Films Holding Limited in respect of the Issue.

DEPONENT

(Sushilkumar Sambhaji Shinde)

VERIFICATION

I, the abovenamed deponent, hereby verify at Mumbai on this 27 day, of May, 2025 that the contents of this affidavit are correct to best of my knowledge and believed by me to be true and that nothing has been concealed therefrom

Reg. No. 2	Page No. 18
Sr. No. 168	
Date 27/5/25	

BEFORE ME

DEPONENT

(Sushilkumar Sambhaji Shinde)



27/5/25
RAVI G. UPADHYAY
ADVOCATE & NOTARY
GOVT. OF INDIA
A-226, Apli Ekta Society,
New Airport Road, Navpada,
Marol Doka, J B Nagar,
Andheri (E), Mumbai - 400050



महाराष्ट्र MAHARASHTRA



Annexure B

AFFIDAVIT

DC 566206



श्री. जे. पी. वाईकर

1, Ujwala Sushilkumar Shinde, Mother of Smruti Sushilkumar Shinde aged about 76 years, presently residing at 16, Gautam Apartment 72, Pali Hill, Bandra West, Mumbai, Maharashtra - 400050 do hereby solemnly affirm and declare as under:

1. I am the Mother of Smruti Sushilkumar Shinde.
2. By way of a letter dated 06 May 2025, I have been informed that SOBO Films Holding Limited is proposing an initial public offering ("Issue"). I am unwilling to be identified, categorized and/or disclosed as a member of the promoter group of SOBO Films Holding Limited by virtue of being an immediate relative of Smruti Sushilkumar Shinde, the promoter of SOBO Films Holding Limited under the requirements prescribed in Regulations 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended time to time.
3. I am unwilling to identify, categorize and disclose any entity related to me by way of my shareholding (as specified in Regulation 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018 as amended in the particular entity as a member of the promoter group of SOBO Films Holding Limited.

15 MAY 2025

002434



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जोड़पत्र-9 Annexure - 1

प्रतिज्ञापनासाठी Only for Affidavit

मुद्रांक विभाग येथील जाब

Ujwala S. Shinde

मुद्रांक विभाग येथील अधिकारी यांना

Archi

मुद्रांक विभाग येथील अधिकारी यांना

दिनांक

15 MAY 2025

मुद्रांक विभाग येथील अधिकारी यांना

मुद्रांक विभाग

मुद्रांक विभाग

एम एम

शासकीय कार्यालय

कागदाची आवश्यकता नाही. (संयुक्त आदेश नं. ०५/०७/२००४) नुसार

ज्या कारणासाठी ज्यांनी मुद्रांक खरेदी केला त्यांनी त्याच कारणासाठी मुद्रांक खरेदी

करण्यासून दमटिन्वित वापरणे बंधनकारक आहे.



4. In light of the above, I am unwilling to provide or confirm any information or statements or undertakings or confirmations pertaining to myself and any entity related to me for inclusion /disclosure in the draft prospectus and the prospectus or any other material or documents in relation to the Issue ("Issue Documents") or for submission to any stock exchange and/or statutory authority or any other person connected with the Issue.
5. I do not (directly or indirectly) have any role in the management, business or operations of SOBO Films Holding Limited or its subsidiary nor in any of the entities forming a part of the promoter group of SOBO Films Holding Limited (as identified in the Issue Documents). I am not on the board of directors SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company (as identified in the Issue Documents) nor do I have any representative on the board of directors of SOBO Films Holding Limited. I do not hold any equity shares or securities of any other class of SOBO Films Holding Limited nor am I a vendor or a supplier or a client of SOBO Films Holding Limited or any of its subsidiaries. Further, as on date, I do not have any related party transactions with SOBO Films Holding Limited and do not have any special rights with respect to SOBO Films Holding Limited through any formal or informal arrangements.
6. I have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by SOBO Films Holding Limited including the Securities and Exchange Board of India and confirm that this affidavit maybe relied upon by SOBO Films Holding Limited, and any advisors and other parties appointed by SOBO Films Holding Limited in respect of the Issue.

U.S. Shinde

DEPONENT

(Ujwala Sushilkumar Shinde)

VERIFICATION

I, the abovenamed deponent, hereby verify at Mumbai on this 27 day, of May, 2025 that the contents of this affidavit are correct to best of my knowledge and believed by me to be true and that nothing has been concealed therefrom

Reg. No.	02	Page No.	18
Sr. No.	169		
Date	27/5/25		



U.S. Shinde

DEPONENT

(Ujwala Sushilkumar Shinde)

BEFORE ME

Ravi G. Upadhyay
27/5/25

RAVI G. UPADHYAY
ADVOCATE & NOTARY
GOVT. OF INDIA
A-226, Apli Ekta Society,
New Airport Road, Navpada,
Marol Naka, J B Nagar,
Anandnagar (E), Mumbai 400050



महाराष्ट्र MAHARASHTRA

2024



Annexure B

AFFIDAVIT

DC 566204

प्रधान मुद्रांक कार्यालय, मुंबई
प.मु.वि.क्र. ८००००९५

- 6 MAY 2025

सक्षम अधिकारी

श्री. जे. पी. वाईकर

I, Praniti Shinde, Sister of Smruti Sushilkumar Shinde aged about 45 years, presently residing at 19, Ashok Nagar, Vijapur Road, Solapur South, Solapur, Maharashtra – 413004 do hereby solemnly affirm and declare as under:

1. I am the Sister of Smruti Sushilkumar Shinde.
2. By way of a letter dated 06 May 2025, I have been informed that SOBO Films Holding Limited is proposing an initial public offering ("Issue"). I am unwilling to be identified, categorized and/or disclosed as a member of the promoter group of SOBO Films Holding Limited by virtue of being an immediate relative of Smruti Sushilkumar Shinde, the promoter of SOBO Films Holding Limited under the requirements prescribed in Regulations 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended time to time.
3. I am unwilling to identify, categorize and disclose any entity related to me by way of my shareholding (as specified in Regulation 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018 as amended in the particular entity as a member of the promoter group of SOBO Films Holding Limited.

15 MAY 2025

002432



जॉइन्ट-१ Annexure - 1
Only for Affidavit
प्रतिज्ञापत्रालादी
मानि
An

प्रतिभा

मुद्रांक विक्त घोषणाये माय +
मुद्रांक विक्त घोषणाये रक्षितानी परा

दिनांक

मुद्रांक विभाग, दिल्ली

05 MAY 2025

मुद्रांक विकत घेऊन घ्यावी

15 MAY 2008

आत्मकीय का वास्तविक स्वरूप जाणवत करायला प्रयत्न करणाला मुलाक
आत्मकीय का वास्तविक स्वरूप जाणवत करायला प्रयत्न करणाला मुलाक
आत्मकीय का वास्तविक स्वरूप जाणवत करायला प्रयत्न करणाला मुलाक

कारणासाठी ज्यांनी मुलांचे खरेदी केले त्यांनी त्यांचे कारणासाठी मुलांचे खरेदी
केल्यामुळे ६ महिन्यात धारणे बंधनकारक आहे.

4. In light of the above, I am unwilling to provide or confirm any information or statements or undertakings or confirmations pertaining to myself and any entity related to me for inclusion /disclosure in the draft prospectus and the prospectus or any other material or documents in relation to the Issue ("Issue Documents") or for submission to any stock exchange and/or statutory authority or any other person connected with the Issue.
5. I do not (directly or indirectly) have any role in the management, business or operations of SOBO Films Holding Limited or its subsidiary nor in any of the entities forming a part of the promoter group of SOBO Films Holding Limited (as identified in the Issue Documents). I am not on the board of directors SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company (as identified in the Issue Documents) nor do I have any representative on the board of directors of SOBO Films Holding Limited. I do not hold any equity shares or securities of any other class of SOBO Films Holding Limited nor am I a vendor or a supplier or a client of SOBO Films Holding Limited or any of its subsidiaries. Further, as on date, I do not have any related party transactions with SOBO Films Holding Limited and do not have any special rights with respect to SOBO Films Holding Limited through any formal or informal arrangements.
6. I have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by SOBO Films Holding Limited including the Securities and Exchange Board of India and confirm that this affidavit may be relied upon by SOBO Films Holding Limited, and any advisors and other parties appointed by SOBO Films Holding Limited in respect of the Issue.



DEPONENT
(Praniti Shinde)


VERIFICATION

I, the abovenamed deponent, hereby verify at Mumbai on this 27 day, of May, 2025 that the contents of this affidavit are correct to best of my knowledge and believed by me to be true and that nothing has been concealed therefrom



BEFORE ME


DEPONENT
(Praniti Shinde)


27/5/25
RAVI G. UPADHYAY
ADVOCATE & NOTARY
GOVT. OF INDIA
A-226, Apli Ekta Society,
New Airport Road, Navpada,
Marol Naka, J B Nagar,
Andheri (E), Mumbai 400059

Reg. No. 02	Page No. 18
Sr. No. 170	
Date 27/5/25	



महाराष्ट्र MAHARASHTRA

2025

DX 906442



श्री. विनायक ब. जाधव

Annexure B

AFFIDAVIT

I, Priti Raj Shroff, Sister of Smruti Sushilkumar Shinde aged about 52 years, presently residing at Villa ORB, 5th Floor, Darabshaw Lane, Nepean Sea Road, Opp St Stephens Church, Cumballa Hill, Mumbai, Maharashtra - 400036 do hereby solemnly affirm and declare as under:

1. I am the Sister of Smruti Sushilkumar Shinde, by birth.
2. By way of a letter dated 06 May 2025, I have been informed that SOBO Films Holding Limited is proposing an initial public offering ("Issue"). I am unwilling to be identified, categorized and/or disclosed as a member of the promoter group of SOBO Films Holding Limited by virtue of being an immediate relative of Smruti Sushilkumar Shinde, the promoter of SOBO Films Holding Limited under the requirements prescribed in Regulations 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended time to time.
3. I am unwilling to identify, categorize and disclose any entity related to me by way of my shareholding (as specified in Regulation 2(1)(pp) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018 as amended in the particular entity as a member of the promoter group of SOBO Films Holding Limited.

PRSLH



4. In light of the above, I am unwilling to provide or confirm any information or statements or undertakings or confirmations pertaining to myself and any entity related to me for inclusion /disclosure in the draft prospectus and the prospectus or any other material or documents in relation to the Issue ("Issue Documents") or for submission to any stock exchange and/or statutory authority or any other person connected with the Issue.
5. I do not (directly or indirectly) have any role in the management, business or operations of SOBO Films Holding Limited or its subsidiary nor in any of the entities forming a part of the promoter group of SOBO Films Holding Limited (as identified in the Issue Documents). I am not on the board of directors SOBO Films Holding Limited or its subsidiary or the entities forming a part of the promoter group of the Company (as identified in the Issue Documents) nor do I have any representative on the board of directors of SOBO Films Holding Limited. I do not hold any equity shares or securities of any other class of SOBO Films Holding Limited nor am I a vendor or a supplier or a client of SOBO Films Holding Limited or any of its subsidiaries. I am not involved in any business affairs of the SOBO Films Holding Limited nor I have any knowledge on operations of the SOBO Films Holding Limited. Further, as on date, I do not have any related party transactions with SOBO Films Holding Limited and do not have any special rights with respect to SOBO Films Holding Limited through any formal or informal arrangements. The Company(ies)/LLP/ Partnership Firms / Trusts / HUFs/ other entities where I am involved are distinctly separate from the SOBO Films Holding Limited and do not possess any common pursuits/interest.
6. I have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by SOBO Films Holding Limited including the Securities and Exchange Board of India and confirm that this affidavit maybe relied upon by SOBO Films Holding Limited, and any advisors and other parties appointed by SOBO Films Holding Limited in respect of the Issue.

PR&L
DEPONENT
(Priti Raj Shroff)

VERIFICATION

I, the abovenamed deponent, hereby verify at Mumbai on this ____ day, of _____, 2025 that the contents of this affidavit are correct to best of my knowledge and believed by me to be true and that nothing has been concealed therefrom



PR&L
DEPONENT
(Priti Raj Shroff)

821
28 **BEFORE ME**
5-25
S.M.N. Naqvi
NOTARY
Government of India
Mumbai & Thane Dist

S. No. *821* P. No. *49*

NOTARY Register. *9/25* Date *28/05/25*



D R N & Associates

Chartered Accountants

Date: May 30, 2025

To,

The Board of Directors

SOBO Films Holding Limited

713, 7th Floor, Crystal Paradise Mall,
Dattaji Salvi Road, Off Veera Desai Road,
Andheri (West), Mumbai- 400053,
Maharashtra, India.

Email: compliance@sobofilms.com

CC:

Comfort Securities Limited

A Wing, Hetal Arch, A-301,
Swami Vivekananda Road,
Malad West, Mumbai - 400064
Maharashtra

Email: merchantbanking@comfortsecurities.co.in

Website: <https://www.comfortsecurities.co.in/>

This is to certify that, based on the information, explanations and documents provided to us by the management of SOBO Films Holding Limited, the following individuals:

1. Mr. Sushilkumar Sambhaji Shinde (PAN: AAOPS7121E)
2. Mrs. Ujwala Sushilkumar Shinde (PAN: AEGPS7315Q)
3. Ms. Praniti S Shinde (PAN: BDKPS7554M)
4. Mrs. Priti Raj Shroff (PAN: ANQPS8035G)
5. Mr. Rajesh Bhagchand Pahariya s/o Mr. Bhagchand Pahariya
6. Mrs. Mamta Bhagchand Pahariya w/o Mr. Bhagchand Pahariya
7. Mr. Sanjay Bhagchand Pahariya s/o Mr. Bhagchand Pahariya
8. Mr. Satindarjit Singh Arora (PAN: AADPA6875C)

have not entered into any financial transactions or related party transactions with SOBO Films Holding Limited including its subsidiary SB Filmz Venturez LLP, either directly or indirectly, in the preceding 3 (three) Financial Years.



D R N & Associates

Chartered Accountants

This certificate is issued at the request of SOBO Films Holding Limited for submission to the Securities and Exchange Board of India (SEBI), the Stock Exchange(s), the Registrar of Companies, Mumbai (RoC) and such other authority(ies), as may be required under the relevant law, for the time being in force in India and does not constitute an audit or assurance engagement.

We confirm that the information in this certificate is true, fair and correct, and there is no untrue statement or omission which would render the contents of this certificate misleading in its form or context.

For DRN & Associates

Chartered Accountants



[CA Dharmesh R. Nag]

Proprietor

Membership No.: 610021

Firm Registration No.: 157176W

UDIN: 25610021BMNURJ2614

Place: Mumbai

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF SOBO FILMS HOLDING LIMITED (Formerly known as SOBO Films Holding Private Limited) ("The Company") HELD ON THURSDAY, JUNE 12, 2025 AT 11:30 AM AT THE REGISTERED OFFICE OF THE COMPANY.

APPROVAL FOR FILING OF APPLICATION REGARDING THE PROMOTER GROUP NAME EXEMPTION WITH SEBI:

The Board of Directors of Company is hereby informed that the Company is planning to file its Draft Prospectus with Stock Exchange and accordingly the Company has identified members of Promoter group. However, members of Promoter group namely Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya are showing unwillingness to be included as promoter group members and not providing any details required to be disclosed in the Issue documents. Thus, the Company needs to file an application with the SEBI for relaxation on inclusion of the name of the dissenting promoter group member in the Issue document.

The Board of Directors discussed the said matter and passed the following resolution:

"RESOLVED THAT pursuant to the regulation 2(1)(pp) the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations"), immediate relatives and their connected entities of Promoters shall be disclosed as members of Promoter group in the Issue document. Accordingly, the Company need to obtain relevant information along with consent to be disclosed in the Issue documents. Pursuant to the regulation 300(1) of the Securities and Exchange Board of India ("Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations"), in case the Company is not disclosing the names and details of any promoter group members, the company needs to obtain approval from SEBI regarding the relaxation of the strict enforcement of the requirement is procedural in nature; or any disclosure requirement is not relevant for a particular class of industry or issuer; or the non-compliance was caused due to factors beyond the control of the issuer.

RESOLVED FURTHER THAT the Company vide its request letter sent via email and/or registered post, requested all the members of promoter group to provide the relevant information, details and documents which is required to be disclosed in the Issue document. However, after multiple requests the Company has not received any communication from the Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya, Mamta Bhagchand Pahariya who are neither willing to be identified as promoter group nor willing to provide any information regarding the same and further Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde have provided the affidavit regarding non-association and unwillingness to be part of Promoter Group. Thus, the Company needs to file an application with SEBI for non-inclusion of such dissenting promoter group members in the issue documents.



SOBO FILMS HOLDING LIMITED



**BREWING
BOLD
ENTERTAINMENT**

RESOLVED FURTHER THAT any Director and/or Company Secretary be and are hereby authorized to undertake all necessary actions, including liaising with regulatory authorities, necessary payments to make for filing an application with Securities and Exchange Board of India ("SEBI") on the above stated matter.

// CERTIFIED TRUE COPY//

For and behalf of the Board of Directors
of **SOBO Films Holding Limited**
(Formerly known as **SOBO Films Holding Private Limited**)



Harvinder Singh Arora

Director and CEO

DIN: 00802852

Address: 301, Atlantis Apartments, J.P Road, Versova, Andheri - West, Mumbai-400061, Maharashtra, India

SOBO FILMS HOLDING LIMITED

(Formerly Known as SOBO FILMS HOLDING PRIVATE LIMITED) CIN NO: U73100MH2012PLC225824

Reg. Office:- 713, 7th Floor, Crystal Paradise Mall, Dattaji Salvi Marg, Off Veera Desai Road, Andheri (W), Mumbai,
MH - 400 053, IN, Tel. No.: +91 22 40227111 / 40327113

 Sign in / Sign up



The payment made to SEBI on Thu Jun 19 11:41:19 IST 2025 for amounting **118000** with payment reference id **BHDF89W0NXVD58** and bank reference id 251700901419 is in **SUCCESS** state. You can view the payment details by visiting "Payment History" tab on Payments Page.



[Payment Form](#) [Payment History](#)

Payment History

PAN 

AAUCS950L

Email 

COMPLIANCE@SOBOFILMS.COM

Reset Details

10 entries per page

Search:

Sr No.	Name	GST No	State	Fee Type	Fee Amount	Only GST Paid	CGST	SGST	IGST	Total Amount Paid	Payment Status	Payment Date	SEBI Reference No
1	SOBO FILMS HOLDING LIMITED	27AAUCS950L12G	Maharashtra	Exemption Fee - Regulation 300 of ICDR	100000	NO	9000	9000	0	118000	Payment Confirmed	19-06-2025	BHOF89WQ100V038

Showing 1 to 1 of 1 entry

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