



प्रबंधक/ Manager

RAC-निर्गम एवं सूचीबद्धता प्रभाग-1 / RAC-Division of Issues and Listing-1

निगम वित्त विभाग / Corporation Finance Department

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SEBI/HO/CFD/RAC-DIL1/P/OW/2025/0000024807/1  
September 18, 2025

**SOBO Films Holding Limited**

713, 7<sup>th</sup> Floor, Crystal Paradise Mall,  
Dattaji Salvi Marg, Off Veera Desai Road,  
Andheri (W), Mumbai - 400053

**Kind Attention: Shri Harvinder Singh Arora**

Dear Sir/Madam,

**Application received under Regulation 300(1)(c) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI (ICDR) Regulations") seeking exemption from disclosing 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 entities in which such individuals may have an interest as a part of the promoter group.**

1. This has reference to your letter dated June 19, 2025 seeking exemption from including (i) Sushilkumar Sambhaji Shinde (father of Smruti Sushilkumar Shinde), (ii) Ujwala Sushilkumar Shinde (mother of Smruti Sushilkumar Shinde), (iii) Priti Raj Shroff (sister of Smruti Sushilkumar Shinde), (iv) Praniti S Shinde (sister of Smruti Sushilkumar Shinde), (v) Sanjay Bhagchand Pahariya (spouse of Smruti Sushilkumar Shinde), (vi) Mamta Bhagchand Pahariya (mother of spouse of Smruti Sushilkumar Shinde), (vii) Rajesh Bhagchand Pahariya (brother of spouse of Smruti Sushilkumar Shinde) and (viii) Satindarjit Singh Arora (brother of Harvinder Singh Arora) (hereinafter referred to as "Related Members") and other entities in which such individuals may have an interest ("Related Entities") as defined under Regulation 2(1)(pp)(iv) of SEBI(ICDR) regulations, 2018 in the promoter group of SOBO Films Holding Limited ("Company").
2. The Company has *inter-alia*, submitted the following grounds while seeking exemption from disclosing the above mentioned Related Members as part of the 'promoter group':
  - a. With reference to Sanjay Bhagchand Pahariya, Rajesh Bhagchand Pahariya and Mamta Bhagchand Pahariya, the Company is unable to obtain information due to Divorce petition pending between the Promoter (Smruti Sushilkumar Shinde) and her spouse (Sanjay Bhagchand Pahariya).

- b. With reference to Sushilkumar Sambhaji Shinde, Ujwala Sushilkumar Shinde, Priti Raj Shroff, Praniti S Shinde, despite repeated correspondence, the Company is unable to obtain information due to their unwillingness to be a part of Promoter Group, supported by respective affidavits in this regard.
  - c. With reference to Satindarjit Singh Arora, the Company is unable to obtain information due to his unwillingness to be a part of Promoter Group
  - d. The Company has not submitted any legal or documentary evidence for supporting clear separation of Promoters from said Related Members.
3. Based on the circumstances of the case, the facts represented and the due diligence certificate submitted by the Lead Manager, the matter was examined, and upon examination, it has been decided not to grant exemption.
4. You are, therefore, advised to ensure the following.
  - 4.1. To classify and disclose (i) Sushilkumar Sambhaji Shinde, (ii) Ujwala Sushilkumar Shinde, (iii) Priti Raj Shroff, (iv) Praniti S Shinde, (v) Sanjay Bhagchand Pahariya, (vi) Rajesh Bhagchand Pahariya, (vii) Mamta Bhagchand Pahariya and (viii) Satindarjit Singh Arora and the Related Entities; as part of the promoter group in the offer documents and make all the applicable disclosures based on the information available in the public domain in the offer documents and inform them about such inclusion as a Promoter group entity;
  - 4.2. Disclose inability to obtain information about Related Members and Related Entities in the offer documents;
  - 4.3. All the applicable disclosures based on the information available in the public domain in the offer documents.
  - 4.4. An appropriate Risk Factor in the offer documents.
5. Further, this letter along with all your aforementioned communications shall be included in the material contracts and documents for inspection as disclosed in the offer document.

Yours faithfully,



**Rushali Mohase**