



# VINIT MOBILE LIMITED

(Formerly known as Vinit Mobile Pvt. Ltd. )

CIN: - U51100GJ2011PLC065617 GST No.: - 24AADCT8502E1ZN

**Address:** - Ground, 1<sup>st</sup> & 2<sup>nd</sup> Floor, P No. 358, Gopal Nagar, Bamroli Althan Express Way Road, Surat, Gujrat 394221  
**Contact No.** +91-9998714990 **Website:** - www.vinitmobile.com **Email Id:** - info@vinitmobile.com

**Date:** July 09, 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

Dear Sir/Madam,

**Sub:** Proposed initial public offering of equity shares of face value Rs.10/- each (the "Equity Shares") of Vinit Mobile 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 Mr. Vikaskumar R Jalan (brother of promoter Mr. Vinit Jalan) and Mrs. Mamta Saraf (sister of promoter Mrs. Shweta Jalan) 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 the "Issue Documents"), in accordance with the SEBI ICDR Regulations (the "Application").





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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;

**“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 Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf;

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

**“Issue Documents”** shall mean all documents that will be filed with the stock exchange with regards to Initial Public Offer;

**“Lead Manager”** shall mean Comfort Securities Limited;

**“Our Company/ The Company/ Issuer Company”** shall mean M/s Vinit Mobile Limited;

**“Promoter”** shall mean Mr. Vinit Jalan and Mrs. Shweta Jalan;

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

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

**“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 under the name “Tanya Silk Mills Private Limited” under the provisions of the Companies Act, 1956 vide Certificate of Incorporation dated May 26, 2011 issued by the Assistant Registrar of Companies, Gujarat, Dadra and Nagar Haveli. Further the name of our Company was changed from “Tanya Silk Mills Private Limited” to “Vinit Mobile Private Limited” vide special resolution passed by the shareholders at the Extra Ordinary General Meeting held on February 19, 2020 and a Fresh Certificate of Incorporation consequent to name change was issued on March 13, 2020 by the Registrar of Companies, Ahmedabad. Subsequently, the status of the Company was changed from private limited to public limited, and the name of our Company was changed to “Vinit Mobile Limited” vide special resolution passed by the shareholders at the Extra Ordinary General Meeting held on May 15, 2025. The fresh certificate of incorporation consequent to conversion was issued on May 21, 2025 by Assistant Registrar of Companies/ Deputy Registrar of Companies/ Registrar of Companies, Centralised Processing Centre. The Corporate Identification Number of our Company is U51100GJ2011PLC065617. Our Company’s registered office is located at Plot no. 358, Ground, 1st & 2nd floor, Gopal Nagar, Bamroli Althan Expressway, Pandesara, Surat, Gujarat – 394221.

**1.2** Our Company i.e M/s Vinit Mobile Limited is engaged in the business of buying, selling, reselling, importing, exporting, transporting, storing, developing, promoting, marketing or supplying, trading, reassembling of mobile, mobile related accessories, TV, Refrigerator or any other electronic items and their accessories, dealing in any manner whatsoever on retail as well as on wholesale basis in India or elsewhere.

**1.3** Subject to market conditions, receipt of necessary approvals and other considerations, our Company is proposing to undertake the Issue. In relation to the Issue, the Company proposes to file the Draft Prospectus (the “DP”) and Prospectus with SME Platform of Stock Exchange(s) 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 Mr. Vinit Jalan and Mrs. Shweta Jalan (the “Promoters”). As on date, they cumulatively hold 8,560 Equity Shares in aggregate, representing 85.60% 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 Draft Prospectus. 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:





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"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 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*

Relationship with Promoter Vinit Jalan		Connected Entities	Nature of Interest in Entities
Self	Vinit Jalan	Vinit Mobile Limited	Body Corporate in which 20% or more Equity Share is held by Vinit Jalan
		CH Fintech Private Limited	
		Vinit Jalan HUF	Karta of HUF
Father	Ravishankar S Jalan	Ravishankar HUF	Karta of HUF
Mother	Ranjana Ravishankar Jalan	Not Applicable	Not Applicable
Sister	Vandana Agarwal	Not Applicable	Not Applicable
	Vijaya R Todi	Shiv Mahima Sarees	Sole Proprietorship
<b>Brother</b>	<b>Vikaskumar R Jalan*</b>	<b>Refer Note 1</b>	<b>Refer Note 1</b>
Spouse	Shweta Jalan	Vinit Mobile Limited	Body Corporate in which 20% or more Equity Share is held by Vinit Jalan
		CH Fintech Private Limited	
Spouse's Father	Vishwanath Khemka	Not Applicable	Not Applicable
Spouse's Mother	Sumitra Devi Khemka	Not Applicable	Not Applicable
Spouse's Brother	Pradeep Khemka	Not Applicable	Not Applicable
Spouse's Sister	Mamta Saraf*	<b>Refer Note 2</b>	<b>Refer Note 2</b>
	Shilpa Khemka	Not Applicable	Not Applicable
Son	Shrey Jalan	Not Applicable	Not Applicable
Daughter	Bhavya Jalan	Not Applicable	Not Applicable

*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*





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*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 persons/entities has been identified as part of the promoter group by virtue of being an immediate relative as per of the promoters and connected entities of said members of promoters and promoter group members (as mentioned in Clause 1.5.1 of this application):

Relationship with Promoter Shweta Jalan		Connected Entities	Nature of Interest in Entities
Self	Shweta Jalan	Vinit Mobile Limited	Body Corporate in which 20% or more Equity Share is held by Vinit Jalan
		CH Fintech Private Limited	
Father	Vishwanath Khemka	Not Applicable	Not Applicable
Mother	Sumitra Devi Khemka	Not Applicable	Not Applicable
Sister	Mamta Saraf*	<b>Refer Note 2</b>	<b>Refer Note 2</b>
Sister	Shilpa Khemka	Not Applicable	Not Applicable
Brother	Pradeep Khemka	Not Applicable	Not Applicable
Spouse	Vinit Jalan	Vinit Mobile Limited	Body Corporate in which 20% or more Equity Share is held by Vinit Jalan
		CH Fintech Private Limited	
		Vinit Jalan HUF	Karta of HUF
Spouse's Father	Ravishankar S Jalan	Ravishankar HUF	Karta of HUF
Spouse's Mother	Ranjana Ravishankar Jalan	Not Applicable	Not Applicable
Spouse's Brother	Vikaskumar R Jalan*	<b>Refer Note 1</b>	<b>Refer Note 1</b>
Spouse's Sister	Vandana Agarwal	Not Applicable	Not Applicable
	Vijaya R Todi	Shiv Mahima Sarees	Sole Proprietorship
Son	Shrey Jalan	Not Applicable	Not Applicable
Daughter	Bhavya Jalan	Not Applicable	Not Applicable

\*Dissenting Member of Promoter Group

**Note 1:** The Company has requested Mr. Vikaskumar R Jalan(brother of Promoter Mr. Vinit Jalan)by sending him arequest letter vide registered-post datedMay 24, 2025, and reminder requests dated June 04, 2025,and June 24, 2025,for providing the relevant information, documents and declarations to be included in the Issue



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documents. Further the Lead Manager to the Issue i.e. Comfort Securities Limited also requested Mr. Vikaskumar R Jalan for providing the required information vide its request letter dated May 28, 2025, and

reminder requests dated June 24, 2025, however neither the Company nor the Lead Manager to Issue received any communication from Mr. Vikaskumar R Jalan regarding the same.

**Note 2:** The Company has requested Mrs. Mamta Saraf (sister of Promoter Mrs. Shweta Jalan) by sending her a request letter vide email dated June 22, 2025 and reminder mails dated June 25, 2025, June 26, 2025, June 27, 2025, June 28, 2025 and registered-post dated June 26, 2025 for providing the relevant information, documents and declarations to be included in the Issue documents. Further the Lead Manager to the Issue i.e. Comfort Securities Limited also requested Mrs. Mamta Saraf for providing the required information vide its email and registered-post dated June 30, 2025, however Mrs. Mamta Saraf vide an email dated July 01, 2025 has refused to provide any details and documents requested from her, and further vide an Affidavit dated July 08, 2025, she has expressed her unwillingness to be identified as a member of the promoter group.

Since the Company does not have any consent and/or relevant information required under the SEBI ICDR Regulations regarding the Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf and their connected entities to be disclosed in Issue documents; we are filing this application with Securities Exchange Board of India (SEBI) for granting the exemption to our Company under Regulation 300 of SEBI ICDR from disclosing the name of Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf and their connected entities in the Issue documents.

1.6 Given that the Company has reached out to the dissenting members for obtaining relevant information and documents by sending them a request letter by email and registered post ("Company's Request Letter" — enclosed as **Annexure B** to this application) but has not received the required information sought from dissenting members either in their capacity as individual members of the Promoter Group of the Company or entities with which they are associated in their 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 4 on basis of the grounds of as detailed in paragraph 2.

## 1. Grounds for seeking exemption

### Inability to obtain information

2.1 The Company has requested Mr. Vikaskumar R Jalan (brother of Promoter Mr. Vinit Jalan) by sending a request letter vide registered-post dated May 24, 2025, reminder requests dated June 04, 2025, June 24, 2025 and to Mrs. Mamta Saraf (Sister of Promoter Mrs. Shweta Jalan) vide email dated June 22, 2025 and reminder mails dated June 25, 2025, June 26, 2025, June 27, 2025, June 28, 2025 and registered-post dated June 26, 2025 for providing the relevant information, documents, confirmations and declarations to be included in the Issue documents in respect of them being classified and disclosed as a part of the Promoter Group of the Company. Further the Lead Manager to the Issue i.e. Comfort Securities Limited also requested Mr. Vikaskumar R Jalan for providing the required information vide its request letter dated May 28, 2025 and reminder requests dated June 24, 2025 and to Mrs. Mamta Saraf vide email and courier dated June 30, 2025. However, the Dissenting Members i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf have not provided the required information, documents, confirmations and declarations sought by the Company or the Lead Manager and consequently refused disclosure of themselves and any entities with whom they are associated, as







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a member of the Promoter Group of the Company in the proposed Draft Prospectus / Issue Documents.

2.2 The Company had also 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 member of the Promoter

Group of the Company. Thus, Mrs. Mamta Saraf vide her affidavit dated July 08, 2025 confirmed that she does not want to be associated with promoter group member of M/s Vinit Mobile Limited (*Annexure D – Enclosed as Affidavit*), However Mr. Vikaskumar R Jalan refused to provide any affidavits or documents or information pertaining to him.

2.3 The Promoters Mr. Vinit Jalan and Mrs. Shweta Jalan vide their joint affidavit dated July 09, 2025, have confirmed that despite having a strained relationship with the dissenting members of Promoter Group they had made Bonafide attempt to obtain the necessary information and documents for disclosure in the Issue documents as per SEBI ICDR Regulations (*Annexure E – Enclosed as Affidavit*).

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

3.1 The dissenting members do not (directly or indirectly) have any role in the management, business or operations of M/s Vinit Mobile Limited or its related entities nor in any of the entities forming a part of the promoter group of M/s Vinit Mobile Limited.

3.2 The dissenting members are not on the board of directors of M/s Vinit Mobile Limited or its related entities 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 M/s Vinit Mobile Limited.

3.3 The dissenting members do not hold any equity shares or securities of any other class of M/s Vinit Mobile Limited, nor are they a vendor or a supplier or a client of M/s Vinit Mobile Limited or any of its related entities.

3.4 The dissenting members of promoter group do not have any control or interest or shareholding in the M/s Vinit Mobile Limited. Further, the dissenting members of promoter group are not associated as directors, key managerial personnel, shareholders, vendor, customer or partners with the Company.

3.5 The dissenting members of promoter group are not associated with any entity in which our promoter Mr. Vinit Jalan or Mrs. Shweta Jalan are an interested party and further the dissenting members of promoter group are not associated with any entities forming part of the Promoter group.

3.6 The dissenting members do not have any shareholding in the Company, nor they are director on the board of the Company or any of the related entities of the Company or the Promoter. Further they do not have any role in the management, business or operations of the Company and its connected entities.

3.7 The dissenting members do not have any related party transactions with M/s Vinit Mobile Limited and do not have any special rights with respect to M/s Vinit Mobile Limited through any formal or informal arrangements as on the date of this application.



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

**3.9** Based on Certificate obtained from Practising Chartered Accountant Firm vide its certificate dated July 08, 2025, it has been certified that, the dissenting member Mrs. Mamta Saraf or her connected entity had not entered into any financial transactions with Promoters or M/s Vinit Mobile Limited in any form, since last three (3) financial years and as on the date of affidavit, she has no financial

transactions outstanding to be paid or received from Promoters or M/s Vinit Mobile Limited. The dissenting member Mr. Vikaskumar R Jalan had entered into the financial transactions with promoter Mr. Vinit Jalan and M/s Vinit Mobile Limited before the dispute or happening of strained relationship with promoter Mr. Vinit Jalan, however all the outstanding dues between the promoter, Company and Mr. Vikaskumar R Jalan has been settled/paid-off and as on the date of this application- Mr. Vikaskumar R Jalan does not have any claim or financial transactions outstanding to be paid or received from Promoters or the M/s Vinit Mobile Limited. *(CA Certificate - enclosed as Annexure C)*

**3.10** Accordingly, the Dissenting Members i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf have indicated that they do not agree to take on any legal obligation nor would they like to be associated with the Issue or the Company now or any time in the future as a member of the promoter group of the Company or 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.

**3.11** Accordingly, our Company is unable to comply with the requirements prescribed under the SEBI ICDR Regulations and other applicable 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 Member i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Sarafas member 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.

**3.12** 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 individual relative 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 member of the Promoter Group of our Company does not include the Dissenting Member, or any Connected Entity(ies) on which they may have interest, at appropriate places in the Issue Documents.

### 3. Relaxation Sought

**4.1** 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:



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- (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.

**4.2** This Application is being made by the Company to SEBI for seeking the relaxation from the requirement to include Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf (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.

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

**4.3.1** Exempting disclosure of name of the Dissenting Members i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf 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

**4.3.2** Not disclosing information and confirmations with respect to the Dissenting Members i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf and their Connected Entities in the Issue Document, required under the SEBI ICDR Regulations.

## 5. Fee Payment details:

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 bearing Receipt Number: **BHDF0RH0PV5ZT4**.

We request you to kindly keep the contents of this Application confidential. We trust the information included in this Application meets your application requirements and look forward to receiving your approval.



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

Contact Person	Telephone Number	Email
Vinit Jalan Director DIN: 08666210	+91-9998714990	<a href="mailto:info@vinitmobile.com">info@vinitmobile.com</a>

Thanking you.

**For Vinit Mobile Limited**  
(Formerly known as Vinit Mobile Private Limited)

*Vinit*  
Vinit Jalan  
DIN: 08666210  
Designation: Director  
Date: July 09, 2025  
Place: Surat







# VINIT MOBILE LIMITED

(Formerly known as Vinit Mobile Pvt. Ltd.)

CIN: - U51100GJ2011PLC065617 GST No.: - 24AADCT8502E1ZN

**Address:** - Ground, 1<sup>st</sup> & 2<sup>nd</sup> Floor, P No. 358, Gopal Nagar, Bamroli Althan Express Way Road, Surat, Gujarat 394221  
**Contact No.** +91-9998714990 **Website:** - www.vinitmobile.com **Email Id:** - info@vinitmobile.com

## Shareholding pattern as on 09.07.2025 – Vinit Mobile Limited

Sr. No.	Name of Shareholder	Promoter	Promoter Group	Non-Promoter	Relationship with promoter	No. of Equity Shares	% of Total Shareholding
1.	Vinit Jalan	✓	✓	NA	NA	4,980	49.80
2.	Shweta Jalan	✓	✓	NA	NA	3,580	35.80
<b>Total Shareholding Promoters (A)</b>						<b>8,650</b>	<b>85.60</b>
3.	Ranjana Jalan	NA	✓	NA	Mother of Vinit Jalan	700	7.00
4.	Ravishankar Jalan	NA	✓	NA	Father of Vinit Jalan	700	7.00
5.	Vandana Agarwal	NA	✓	NA	Sister of Vinit Jalan	10	0.10
6.	Vijaya R Todi	NA	✓	NA	Sister of Vinit Jalan	10	0.10
<b>Total Shareholding Promoter Group (B)</b>						<b>1,420</b>	<b>14.20</b>
7.	Gourav	NA	NA	✓	No-Relation	10	0.10
8.	Lichhman Ram Murarka	NA	NA	✓	No-Relation	10	0.10
<b>Total Shareholding Public (C)</b>						<b>20</b>	<b>0.20</b>
<b>Total Shareholding (A+B+C)</b>						<b>10,000</b>	<b>100.00%</b>



Vinit



# VINIT MOBILE LIMITED

(Formerly known as Vinit Mobile Pvt. Ltd. )

CIN: - U51100GJ2011PLC065617 GST No.: - 24AADCT8502E1ZN

Address: - Ground, 1<sup>st</sup> & 2<sup>nd</sup> Floor, P No. 358, Gopal Nagar, Bamroli Althan Express Way Road, Surat, Gujarat 394221  
Contact No. +91-9998714990 Website: - www.vinitmobile.com Email Id: - info@vinitmobile.com

Date: 24<sup>th</sup> May 2025

To,  
**Vikas Jalan**  
Jaisinghpura Sahara Bhilwara  
Sahara, Bhilwara, Rajasthan – 311 806

Dear Vikas Jalan,

**Sub: Request to provide information as a member of promoter group of Vinit Mobile 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.

Vinit Jalan and Shweta Jalan 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 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.

**Vinit Mobile Limited**

**Vinit Jalan**

Plot no. 358, Ground, 1<sup>st</sup> & 2<sup>nd</sup> floor,  
Gopal Nagar, Bamroli Althan Expressway,  
Pandesara, Surat City, Gujarat- 394 221  
Email: info@vinitmobile.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, Ahmedabad at Gujarat 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 Vinit Mobile Limited**

  
**Vinit Jalan**  
Director  
DIN: 08666210





# VINIT MOBILE LIMITED

(Formerly known as Vinit Mobile Pvt. Ltd.)

CIN: - U51100GJ2011PLC065617 GST No.: - 24AADCT8502E1ZN

**Address:** - Ground, 1<sup>st</sup> & 2<sup>nd</sup> Floor, P No. 358, Gopal Nagar, Bamroli Althan Express Way Road, Surat, Gujrat 394221

**Contact No.** +91-9998714990 **Website:** - www.vinitmobile.com **Email Id:** - info@vinitmobile.com

**Date:** 26<sup>th</sup> June 2025

To,

**Mamta Saraf**

Plot No- 11/2, Flat No- 1003A,

10th Floor, Balaji Apartment, A- Block,

Sector-14, VTC: Rohini, Po: Rohini Sector- 7,

Narela, North West Delhi- 110085, Delhi

Dear Mamta Saraf,

**Sub: Request to provide information as a member of promoter group of Vinit Mobile 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.

Vinit Jalan and Shweta Jalan 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)



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 Shweta Jalan's sister.

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.

**Vinit Mobile Limited**

**Vinit Jalan**

Plot no. 358, Ground, 1<sup>st</sup> & 2<sup>nd</sup> floor,  
Gopal Nagar, Bamroli Althan Expressway,  
Pandésara, Surat City, Gujarat- 394 221  
Email: [info@vinitmobile.com](mailto:info@vinitmobile.com)

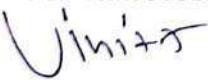
We reiterate that in the event we do not receive a written response providing the requisite information in the specified format and the affidavit, you will continue to remain a member of the promoter group of the Company. Accordingly, you will be named as the member of promoter group of the Company in 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, Ahmedabad at Gujarat 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 Vinit Mobile Limited**



**Vinit Jalan**  
Director (DIN: 08669210)



Date: May 28, 2025

To,  
**Vikas Jalan**  
Jaisinghpura Sahara Bhilwara  
Sahara, Bhilwara, Rajasthan – 311 806

Dear Vikas Jalan,

**Sub: Request to provide information as a member of promoter group of Vinit Mobile 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.

Vinit Jalan and Shweta Jalan 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;

**COMFORT SECURITIES LIMITED**

CIN : U67120MH2002PLC136562

Registered Office :- A-301, Hetal Arch, S.V. Road,  
Opp. Natraj Market, Malad (West), Mumbai - 400064

☎ 022- 6894-8500/08

✉ info@comfortsecurities.co.in

🌐 www.comfortsecurities.co.in



- (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 Vinit Jalan’s brother.

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.

**Vinit Mobile Limited**

**Vinit Jalan**

Plot no. 358, Ground, 1<sup>st</sup> & 2<sup>nd</sup> floor,  
Gopal Nagar, Bamroli Althan Expressway,  
Pandesar, Surat City, Gujarat- 394 221  
Email: [info@vinitmobile.com](mailto:info@vinitmobile.com)

or

**Comfort Securities Limited**

**Alok Prasad**

Compliance officer

A Wing, Hetal Arch, A-301, Swami Vivekananda Rd, opp.  
Natraj Market, Malad, Navy Colony, Mamledarwadi,  
Malad West, Mumbai, Maharashtra 400064

Email: [merchantbanking@comfortsecurities.co.in](mailto:merchantbanking@comfortsecurities.co.in)

Contact: +91 81084 86841 | 022 6517 3315 / 3318

## COMFORT SECURITIES LIMITED

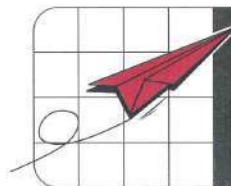
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**COMFORT  
SECURITIES**

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, Ahmedabad at Gujarat 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 Comfort Securities Limited**


**Alok Prasad**  
Compliance Officer

## COMFORT SECURITIES LIMITED

CIN : U67120MH2002PLC136562

Registered Office :- A-301, Hetal Arch, S.V. Road,  
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🌐 [www.comfortsecurities.co.in](http://www.comfortsecurities.co.in)



Date: 30<sup>th</sup> June 2025

To,  
**Mamta Saraf**  
 Plot No- 11/2, Flat No- 1003A,  
 10th Floor, Balaji Apartment, A- Block,  
 Sector-14, VTC: Rohini, Po: Rohini Sector- 7,  
 Narela, North West Delhi- 110085, Delhi  
 Email: [khemkamamta3@gmail.com](mailto:khemkamamta3@gmail.com)

Dear Mamta Saraf,

**Sub: Request to provide information as a member of promoter group of Vinit Mobile 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.

Vinit Jalan and Shweta Jalan 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".

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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 Shweta Jalan's sister.

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, ITRs, GST Returns and Bank Statements to the below mentioned address along with the executed draft of the Annexure A or Annexure B as applicable.

**Comfort Securities Limited**

**Alok Prasad**

**301, A wing, Hetal Arch, Malad West, Mumbai – 400064**

**Email:** [merchantbanking@comfortsecurities.co.in](mailto:merchantbanking@comfortsecurities.co.in)


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, Ahmedabad at Gujarat 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 Comfort Securities Limited**

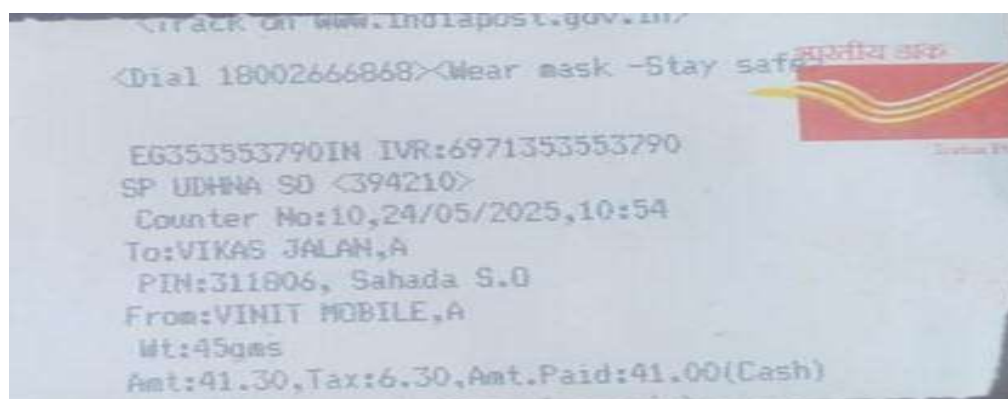
  
**Alok Prasad**  
Compliance Officer



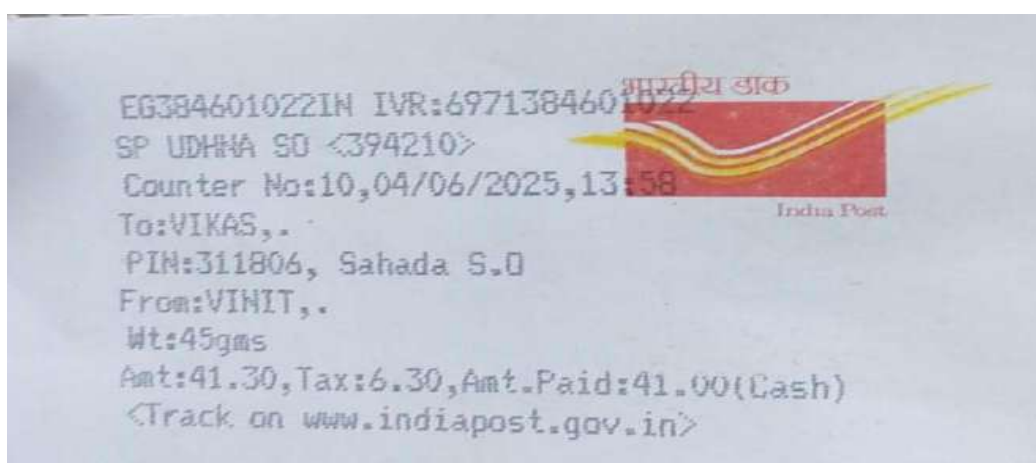


To Vikaskumar R Jalan

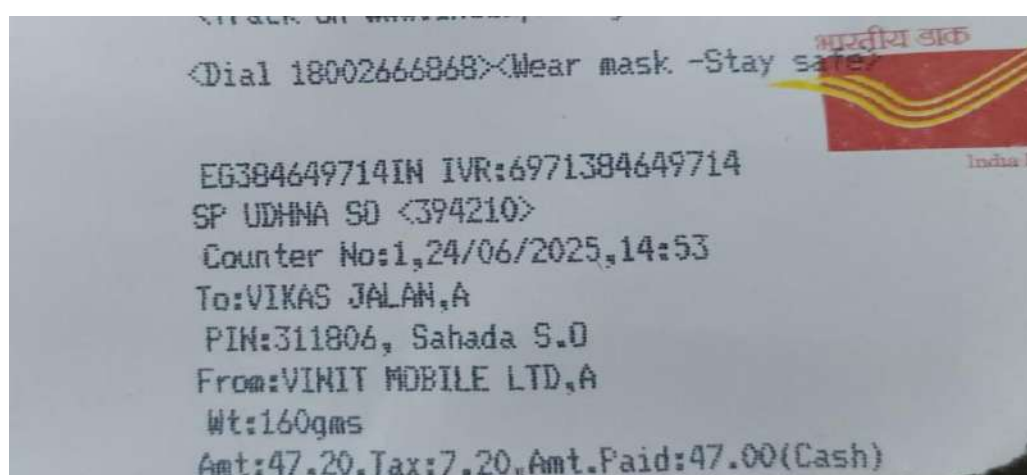
1. Request Letter from Vinit Mobile Limited vide Registered Post dated: May 24, 2025



2. Reminder request- 1 from Vinit Mobile Limited vide Registered Post dated: June 04, 2025



3. Reminder request- 2 from Vinit Mobile Limited vide Registered Post dated: June 26, 2025



4. Request Letter from Comfort Securities Limited vide Courier dated: May 28, 2025

<b>DTDC</b>		<b>DTDC Express Limited</b> Regd Office: No-3, Victoria Road Bengaluru - 560017		<b>ORIGIN</b>	<b>DEST.</b>
<b>Non Negotiable Consignment Note / Subject to Bengaluru Jurisdiction.</b>		<b>POUCH NO.</b>		<b>DATE</b> 28/05/22	
<b>1 Sender's (Consignor) Name:</b> <u>Comfort Securities</u>		<b>2 Recipient's (Consignee) Name:</b> <u>Vikas Kumar</u>		<b>3 Ph:</b> <u>311 806</u>	
<b>Company Name &amp; Address:</b>		<b>Company Name &amp; Address:</b>		<b>City:</b> <u>Bhilwara</u>	
<b>City:</b>		<b>State:</b>		<b>PIN Code:</b>	
<b>Sender's GSTIN:</b>		<b>Recipient's GSTIN:</b>		<b>City:</b>	
<b>3 Nature of consignment (✓):</b>		<b>4 Description of Content:</b>		<b>Total Value of consignment for carriage (₹-Rupee):</b>	
<b>Box</b> <input type="checkbox"/> <b>Non-Box</b> <input type="checkbox"/> <b>Total Num of Pcs:</b>					
<b>DM 1 L</b> cm X B cm X H cm X Pcs <b>Actual Wt:</b> kg					
<b>DM 2 L</b> cm X B cm X H cm X Pcs <b>Volume Wt:</b> kg					
<b>DM 3 L</b> cm X B cm X H cm X Pcs <b>Chargeable Wt:</b> kg					
<b>5 Paper Work Enclosures</b>		<b>6 Type of consignment (✓):</b>		<b>7 Value Added Services:</b>	
		<b>Commercial</b> <input type="checkbox"/> <b>Non Commercial</b> <input type="checkbox"/>		<b>Not Available</b>	
<b>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</b>		<b>9 Charges:</b>		<b>8 Model (✓):</b> <b>Surface</b> <input type="checkbox"/> <b>Air Cargo</b> <input type="checkbox"/> <b>Express</b> <input type="checkbox"/>	
		<b>a) Insured (✓) PSC + Transit</b>		<b>Consignment Number:</b> <u>M51026412</u>	
		<b>b) Risk Surcharge</b>			
		<b>c) Total amount (₹-Rupee)</b>			
		<b>Mode of Payment:</b> <input type="checkbox"/> Cash <input type="checkbox"/> Card <input type="checkbox"/> Net			
<b>11 Booking Branch / Franchise Code</b>		<b>12 Risk Surcharge</b>		<b>Owner</b>	
				<b>Carrier</b>	
<b>Date:</b>		<b>Time:</b> AM/PM		<b>SENDER COPY</b>	
<b>I have read and understood terms &amp; conditions printed overleaf of this or main note and agree to the same</b>		<b>Courier Signature</b>		<b>Jan. 2024</b>	
<b>http://www.dtdc.in    customersupport@dtcd.com    +91-9606 911 811</b>					

5. Reminder Letter from Comfort Securities Limited vide Courier dated: June 24, 2025

<b>DTDC</b>		<b>DTDC Express Limited</b> Regd Office: No-3, Victoria Road Bengaluru - 560017		<b>ORIGIN</b>	<b>DEST.</b>
<b>Non Negotiable Consignment Note / Subject to Bengaluru Jurisdiction.</b>		<b>POUCH NO.</b>		<b>DATE</b> 24/06/22	
<b>1 Sender's (Consignor) Name:</b> <u>Comfort Securities</u>		<b>2 Recipient's (Consignee) Name:</b> <u>Vikas Kumar</u>		<b>3 Ph:</b> <u>311 806</u>	
<b>Company Name &amp; Address:</b>		<b>Company Name &amp; Address:</b>		<b>City:</b> <u>Bhilwara</u>	
<b>City:</b>		<b>State:</b>		<b>PIN Code:</b>	
<b>Sender's GSTIN:</b>		<b>Recipient's GSTIN:</b>		<b>City:</b>	
<b>3 Nature of consignment (✓):</b>		<b>4 Description of Content:</b>		<b>Total Value of consignment for carriage (₹-Rupee):</b>	
<b>Box</b> <input type="checkbox"/> <b>Non-Box</b> <input type="checkbox"/> <b>Total Num of Pcs:</b>					
<b>DM 1 L</b> cm X B cm X H cm X Pcs <b>Actual Wt:</b> kg					
<b>DM 2 L</b> cm X B cm X H cm X Pcs <b>Volume Wt:</b> kg					
<b>DM 3 L</b> cm X B cm X H cm X Pcs <b>Chargeable Wt:</b> kg					
<b>5 Paper Work Enclosures</b>		<b>6 Type of consignment (✓):</b>		<b>7 Value Added Services:</b>	
		<b>Commercial</b> <input type="checkbox"/> <b>Non Commercial</b> <input type="checkbox"/>		<b>Not Available</b>	
<b>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</b>		<b>9 Charges:</b>		<b>8 Model (✓):</b> <b>Surface</b> <input type="checkbox"/> <b>Air Cargo</b> <input type="checkbox"/> <b>Express</b> <input type="checkbox"/>	
		<b>a) Insured (✓) PSC + Transit</b>		<b>Consignment Number:</b> <u>M50874640</u>	
		<b>b) Risk Surcharge</b>			
		<b>c) Total amount (₹-Rupee)</b>			
		<b>Mode of Payment:</b> <input type="checkbox"/> Cash <input type="checkbox"/> Card <input type="checkbox"/> Net			
<b>11 Booking Branch / Franchise Code</b>		<b>12 Risk Surcharge</b>		<b>Owner</b>	
				<b>Carrier</b>	
<b>Date:</b>		<b>Time:</b> AM/PM		<b>SENDER COPY</b>	
<b>I have read and understood terms &amp; conditions printed overleaf of this or main note and agree to the same</b>		<b>Courier Signature</b>		<b>Jan. 2024</b>	
<b>http://www.dtdc.in    customersupport@dtcd.com    +91-9606 911 811</b>					

To Mamta Saraf

1. Request Letter from Vinit Mobile Limited vide Registered Post dated: June 26, 2025

E6301600843IN IVR:6971301600843  
 SP UDHNA SD <394210>  
 Counter No:1,26/06/2025,11:49  
 To:MAMTA SARAF,A  
 PIN:110085, Rohini Sector7 SD  
 From:VINIT MOBILE LTD,A  
 Wt:35gms  
 Amt:41.30,Tax:6.30,Amt.Paid:41.00(Cash)  
 /Track on www.indianpost.gov.in>



## 2. Request Letter from Comfort Securities Limited vide Registered Post dated: June 30, 2025

<b>DTDC Express Limited</b> Regd. Office No-3, Victoria Road Bengaluru - 560047		<b>ORIGIN</b> POUCH NO.	<b>DEST.</b> DATE: 20/06/24
<b>Non-Negotiable Consignment Note</b> Subject to Receipt of Consignment		The consignment is to be transported by air/road/rail/sea by DTDC, consigned subject to the terms and conditions of the DTDC Express Limited.	
1. <b>Sender's (Consigner) Name:</b> Comfort Securities Company Name & Address:		2. <b>Recipient's (Consignee) Name:</b> Mamta Saraf Company Name & Address:	
City: State: PIN Code:		City: State: PIN Code:	
3. <b>Sender's GSTIN*:</b>		4. <b>Recipient's GSTIN*:</b>	
5. <b>Details of consignment (L/H):</b> 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. kg		6. <b>Description of Consignment:</b>	
7. <b>Paper Work Enclosures:</b>		8. <b>Type of consignment (✓):</b> Commercial <input type="checkbox"/> Non-Commercial <input type="checkbox"/>	
9. <b>Charges:</b> Amount (₹) All Tariff Incl. Of PSC + Taxes All Risk Surcharge (i) Total amount (₹): Above charges are inclusive of GST & other taxes if applicable Mode of Payment: Cash <input type="checkbox"/> Card <input type="checkbox"/> Micro <input type="checkbox"/>		10. <b>Mode (✓):</b> Surface <input type="checkbox"/> Air Cargo <input type="checkbox"/> Express <input type="checkbox"/>	
11. <b>Booking Branch / Franchise Code:</b>		12. <b>Risk Surcharge:</b>	
13. <b>Consignment Number:</b> M50874687		14. <b>Owner:</b> <b>Carrier:</b>	
Sender's Signature & Seal:		Courier Signature:	
Date: Time: AM/PM:		SENDER COPY Jan. 2024	

## 3. First request email from Vinit Mobile Limited dated: June 22, 2025

On 06/22/2025 1:36 PM IST Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)> wrote:

Dear Mamta Saraf,

Hope this email finds you well,

We, Vinit Mobile 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 Vinit Jalan and Shweta Jalan, 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)

We have pre-filled the details and documents that are already in our records, however we 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: Vinit Jalan  
 Director  
 Contact No: +91 93746 74493

## 4. Reminder email-1 from Vinit Mobile Limited dated: June 25, 2025

On 06/25/2025 3:47 PM IST Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)> wrote:

Dear Mamta ji,

Gentle Reminder to provide the details and documents as requested in trailing mail.

Vinit Jalan,  
 Director  
 Cont. No. 9374674493

## 5. Reminder email- 2 from Vinit Mobile Limited dated: June 26, 2025

On 06/26/2025 10:53 AM IST Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)> wrote:

Dear Mamta Ji,

Once again it's a gentle reminder from our side. Request you to provide the details & documents at the earliest.

Vinit Jalan,  
Director,  
Cont No.9374674493

## 6. Reminder email- 3 from Vinit Mobile Limited dated: June 27, 2025

On 06/27/2025 6:18 PM IST Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)> wrote:

Dear Mamta Ji,

Once again it's a gentle reminder from our side. Request you to provide the details & documents at the earliest.

Vinit Jalan,  
Director,  
Cont No.9374674493

## 7. Reminder email- 4 from Vinit Mobile Limited dated: June 28, 2025

On 06/28/2025 11:07 AM IST Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)> wrote:

Dear Mamta Ji,

It's a gentle reminder from our side. Request you to provide the details & documents at the earliest.

Vinit Jalan,  
Director,  
Cont No.9374674493

## 8. Reminder email- 5 from Vinit Mobile Limited dated: June 30, 2025

From: Vinit Mobile <[info@vinitmobile.com](mailto:info@vinitmobile.com)>  
Date: Mon, Jun 30, 2025 at 5:06 PM  
Subject: Re: Investment Schedule and Consent Letter \_ Vinit Mobile Limited  
To: [khemkamamta3@gmail.com](mailto:khemkamamta3@gmail.com) <[khemkamamta3@gmail.com](mailto:khemkamamta3@gmail.com)>  
Cc: [merchantbanking@comfortsecurities.com](mailto:merchantbanking@comfortsecurities.com) <[merchantbanking@comfortsecurities.com](mailto:merchantbanking@comfortsecurities.com)>, [sandeep@comfortsecurities.co.in](mailto:sandeep@comfortsecurities.co.in) <[sandeep@comfortsecurities.co.in](mailto:sandeep@comfortsecurities.co.in)>, [alok@comfortsecurities.co.in](mailto:alok@comfortsecurities.co.in) <[alok@comfortsecurities.co.in](mailto:alok@comfortsecurities.co.in)>

Dear Mamta Ji,

It's a gentle reminder from our side. Request you to provide the details & documents at the earliest.

Vinit Jalan,  
Director,  
Cont No.9374674493

## Refusal email from Mamta Saraf to Vinit Mobile Limited dated July 01, 2025

On 07/01/2025 10:16 PM IST MAMTA KHEMKA <[khemkamamta3@gmail.com](mailto:khemkamamta3@gmail.com)> wrote:

Dear Vinit Jalan,

I acknowledge the receipt of your repeated requests for certain personal documents, including KYC documents, IT demand screenshots, ITRs, bank statements, investment schedule, and consent letter, as per your letter dated June 18, 2025, intended for disclosure in the issue document to be filed with the relevant authorities in connection with the proposed IPO.

I would like to clarify that the documents you have requested are strictly personal in nature, and I am not willing to disclose them to any party. Furthermore, I am not connected to Vinit Mobile Limited in any capacity and, therefore, do not wish to be identified or associated as a member of the Promoter Group.

In case any affidavit or written confirmation is required to confirm my non-association as a Promoter Group member, I am willing to provide the same.

Kindly consider this as my formal communication in this regard.

Regards,  
Mamta Saraf



Date: 08.07.2025

To,  
**The Board of Directors,**  
 VINIT MOBILE LIMITED  
*(Formerly known as Vinit Mobile Private Limited)*  
 Plot no. 358, Ground, 1st & 2nd floor,  
 Gopal Nagar, Bamroli Althan Expressway,  
 Pandesara, Surat City- 394221, Gujarat, India.

To,  
**The Lead Manager**  
 Comfort Securities Limited  
 301, 3rd Floor, A-Wing, Hetal Arch,  
 Opp. Natraj Market, S.V. Road,  
 Malad (West), Mumbai- 400064, Maharashtra, India

**Reference: Exemption under Regulation 300 of SEBI ICDR 2018 from Disclosure of Promoter Group (as defined under Regulation 2(1)(pp) of SEBI ICDR 2018) for Proposed SME IPO of limited.**

This is to inform that Vinit Mobile Limited (Formally known as Vinit Mobile Private Limited (Proposed – SME IPO), seeking exemption under Regulation 300 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 from Disclosure of Promoter Group (as defined under Regulation 2(1)(pp) for mere two Immediate relative namely Mr. Vikaskumar R Jalan (Brother of promoter Vinit Jalan) and Mrs. Mamta Saraf (Sister of Promoter Shweta Jalan) in the Issue documents to be filed with Stock Exchange.

I, CA Ravish Baweja, practicing chartered accountant at M/s. R. Baweja & Associates, do hereby certify that, based on the review of Audited Financial Statements, Bank Statements, Income Tax returns, GST returns, and the explanation received from Management of Vinit Mobile Limited bearing CIN: U51100GJ2011PLC065617 and PAN: AADCT8502E for the last 3 financial years, Mr. Vikaskumar R Jalan (PAN: ADWPJ4609F) and Mrs. Mamta Saraf (PAN: EHWPS6980Q) has entered into following financial transaction:

(in Rs.)

<b><i>With Vikaskumar R. Jalan (PAN: ADWPJ4609F)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	₹56,000/-	Paid towards rent	FY 2023-24
2.	₹2,84,600/-	Paid towards reimbursement	FY 2023-24
3.	₹49,729/-	Amount received as Loan	FY 2023-24
4.	₹2,397/-	Amount paid (Including Interest of Rs. 677)	FY 2023-24
5.	₹63,000/-	Paid towards rent	FY 2024-25
6.	₹1,14,663/-	Paid towards reimbursement	FY 2024-25
7.	₹48,009/-	Amount paid towards Loan	FY 2024-25
<b>Outstanding amount as on 30.06.2025 – Nil</b>			

<b><i>With Vikas Ravishankar Jalan HUF (PAN: AAJHV2580B)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	₹11,39,530/-	Amount received	FY 2023-24
2.	₹13,916/-	Interest on Loan	FY 2023-24
3.	₹25,000/-	Amount paid	FY 2023-24
4.	₹18,74,218/-	Amount paid	FY 2024-25
5.	₹7,00,000/-	Amount received	FY 2024-25
6.	45,772/-	Interest on Loan	FY 2024-25
<b>Outstanding amount as on 30.06.2025 – Nil</b>			
<b><i>With Mamta Saraf (PAN: EHWPS6980Q)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	Nil	Amount received	FY 2022-23
2.	Nil	Amount paid	FY 2022-23
3.	Nil	Amount received	FY 2023-24
4.	Nil	Amount paid	FY 2023-24
5.	Nil	Amount received	FY 2024-25
6.	Nil	Amount paid	FY 2024-25

And further as per review of personal bank account statements and Income tax returns of Promoters viz. Mr. Vinit Jalan and Mrs. Shweta Jalan, and HUF of Promoter viz. Vinit Ravishankar Jalan HUF for the last 3 financial years, Mr. Vikaskumar R Jalan, Vikas Ravishankar Jalan HUF and Mrs. Mamta Saraf has entered into following financial transaction:

<b><i>With Vikaskumar R. Jalan (PAN: ADWPJ4609F)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	₹23,400/-	Amount received for reimbursement of expenses	FY 2023-24
2.	₹17,00,000/-	Amount received on behalf of Ranjana Jalan	FY 2024-25
3.	₹17,00,000/-	Amount paid from Ranjana Jalan	FY 2024-25
<b>Outstanding amount as on 30.06.2025 – Nil</b>			
<b><i>With Vikas Ravishankar Jalan HUF (PAN: AAJHV2580B)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	₹18,000/-	Received by Vinit Ravishankar Jalan HUF towards Reimbursement of Expenses	FY 2021-22
2.	₹2,00,000/-	Received by Shweta Jalan towards Reimbursement of Expenses	FY 2024-25
<b>Outstanding amount as on 30.06.2025 – Nil</b>			
<b><i>With Mamta Saraf (PAN: EHWPS6980Q)</i></b>			
<b>Sr. No.</b>	<b>Amount</b>	<b>Nature of Transaction</b>	<b>Financial Year</b>
1.	Nil	Amount received	FY 2022-23
2.	Nil	Amount paid	FY 2022-23
3.	Nil	Amount received	FY 2023-24

308, Shubh Universal, Opp. Vijya Laxmi Hall, Vesu, Surat – 395007.

+91 87358-94585

[rbaweja.rb@gmail.com](mailto:rbaweja.rb@gmail.com)



4.	Nil	Amount paid	FY 2023-24
5.	Nil	Amount received	FY 2024-25
6.	Nil	Amount paid	FY 2024-25

Further, for your ready reference the relationship between promoters and Relatives is set out below:

Sr. No.	Relatives of Promoters as per Regulation 2(1)(pp) of SEBI ICDR, 2018	Relation with Mr. Vinit Jalan (Promoter)	Relation with Mrs. Shweta Jalan (Promoter)
1.	Vikaskumar R Jalan	Brother	Spouse's Brother
2.	Mamta Saraf	Spouse's Sister	Sister

Based on above particulars, we undersigned, hereby confirm that the Promoters of the Issuer Company i.e. Vikas Jalan and Shweta Jalan and Issuer Company i.e. Vinit Mobile Limited does not have any outstanding financial transactions to be received or paid (directly or indirectly) with promoter's Immediate Relatives i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf.

This certificate is issued at the request of Vinit Mobile Limited for submission to the Securities and Exchange Board of India (SEBI), the Stock Exchange(s), the Registrar of Companies, Ahmedabad (RoC) and such other authority(ies), as may be required under the relevant law, for the time being in force in India.

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: M/s. R Baweja and Associates**  
**(Chartered Accountants)**

**RAVISH**  
**BAWEJA**


Digitally signed by  
RAVISH BAWEJA  
Date: 2025.07.08  
21:33:11 +05'30'

**CA Ravish Baweja**  
**(Proprietor)**

UDIN: 25187303BMIIGI3872

Date: 08.07.2025

Place: Surat.

 308, Shubh Universal, Opp. Vijya Laxmi Hall, Vesu, Surat – 395007.



+91 87358-94585

[rbaweja.rb@gmail.com](mailto:rbaweja.rb@gmail.com)





सत्यमेव जयते

## INDIA NON JUDICIAL

### Government of National Capital Territory of Delhi

#### e-Stamp

Certificate No.	: IN-DL13394482347197X
Certificate Issued Date	: 05-Jul-2025 12:41 PM
Account Reference	: IMPACC (IV)/ dl717303/ DELHI/ DL-ESD
Unique Doc. Reference	: SUBIN-DL71730362653510271705X
Purchased by	: MAMTA SARAF
Description of Document	: Article 4 Affidavit
Property Description	: Not Applicable
Consideration Price (Rs.)	: 0 (Zero)
First Party	: MAMTA SARAF
Second Party	: Not Applicable
Stamp Duty Paid By	: MAMTA SARAF
Stamp Duty Amount(Rs.)	: 100 (One Hundred only)



Please write or type below this line

This Stamp Paper forms an integral part of the Affidavit of Ms. Mamta Saraf dated

08 JUL 2025, July, 2025.

*[Handwritten signature]*

#### Statutory Alert:

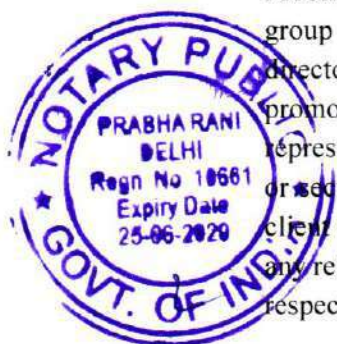
1. The authenticity of this Stamp certificate should be verified at 'www.sholestamp.com' or using e-Stamp Mobile App of Stock Holding Corporation of India Limited. Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid.
2. The onus of checking the legitimacy is on the users of the certificate.
3. In case of any discrepancy please inform the Competent Authority.



## AFFIDAVIT

I, Mamta Saraf, W/o Sandeep Saraf aged about 43 years, presently residing at Plot No- 11/2, Flat No- 1003A, 10th Floor, Balaji Apartment, A- Block, Sector-14, VTC: Rohini, Po: Rohini Sector- 7, Narela, North-West Delhi- 110085, Delhi, do hereby solemnly affirm and declare as under:

1. I am the sister of Shweta Jalan.
2. By way of a letter dated June 18, 2025, I have been informed that Vinit Mobile 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 Vinit Mobile Limited by virtue of being an immediate relative of Vinit Jalan and Shweta Jalan, the promoter of Vinit Mobile 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 Vinit Mobile Limited.
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 Vinit Mobile Limited or its connected entities nor in any of the entities forming a part of the promoter group of Vinit Mobile Limited (as identified in the Issue Documents). I am not on the board of directors Vinit Mobile Limited or its connected entities 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 Vinit Mobile Limited. I do not hold any equity shares or securities of any other class of Vinit Mobile Limited nor am I a vendor or a supplier or a client of Vinit Mobile Limited or any of its connected entities. Further, as on date, I do not have any related party transactions with Vinit Mobile Limited and do not have any special rights with respect to Vinit Mobile Limited through any formal or informal arrangements.
6. Further, I confirm that:-
  - i. I have not, at any stage, been prohibited or debarred from accessing the capital market;
  - ii. I am not associated with the securities related business in any manner nor am/was I registered with the SEBI;
  - iii. I have not been classified or identified as a wilful defaulter or fraudulent borrower by any bank or financial institution or as a fugitive economic offender as defined under Section 12 of the Fugitive Economic Offenders Act, 2018;
7. There is no litigation or proceeding or FIR, threatened or pending, against me or any of the entities connected with me, which could have a materially adverse effect on the position of the Vinit Mobile Limited.
8. There is no proposal whereby I will receive any portion of the proceeds from the proposed IPO and there is no material existing or anticipated transaction with me in relation to the utilization



A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

of such proceeds. Further, there is no arrangement between the Company and me pursuant to which the proceeds of the IPO shall be indirectly routed to me.

9. I hereby affirm that I do not have any outstanding tax liabilities or any criminal/ civil prosecution for any offences, disputes, defaults, non-payment of statutory dues, proceedings initiated for economic offences against or in respect of me as an individual or any Company, LLP, Partnership Firm, Sole-Proprietorship, Trust, other ventures with which I am or have been associated in the past as Promoter, Director, Partner, Trustee or Major shareholder
10. I have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by Vinit Mobile Limited including the Securities and Exchange Board of India and confirm that this affidavit may be relied upon by Vinit Mobile Limited, and any advisors and other parties appointed by Vinit Mobile Limited in respect of the Issue.



**DEPONENT**  
(Mamta Saraf)

#### VERIFICATION

I, the abovenamed deponent, hereby verify at Delhi on this **08 JUL 2025** day, of July, 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.



**DEPONENT**  
(Mamta Saraf)



**ATTESTED**

  
NOTARY PUBLIC, DELHI (INDIA)

**08 JUL 2025**





IN-GJ56878835818955X

2656

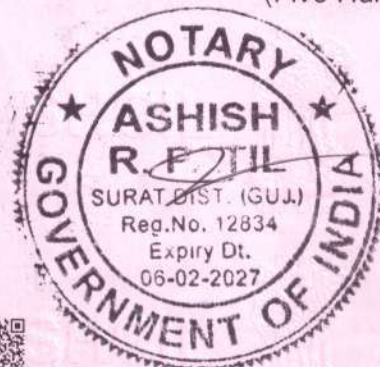


सत्यमेव जयते

**INDIA NON JUDICIAL**  
**Government of Gujarat**  
**Certificate of Stamp Duty**

Register Serial No: 2656  
Date: 09 JUL 2025  
My Commission Expires  
on 01 February 2027

Certificate No. : IN-GJ56878835818955X  
Certificate Issued Date : 08-Jul-2025 05:32 PM  
Account Reference : CSCACC (GV)/ gjcsceg07/ GJ-SUMAN0372/ GJ-SU  
Unique Doc. Reference : SUBIN-GJGJCSCEG0720903252996594X  
Purchased by : VINIT MOBILE LIMITED  
Description of Document : Article 4 Affidavit  
Description : AFFIDAVIT  
Consideration Price (Rs.) : 0  
(Zero)  
First Party : VINIT JALAN AND SHWETA JALAN  
Second Party : VINIT MOBILE LIMITED  
Stamp Duty Paid By : VINIT MOBILE LIMITED  
Stamp Duty Amount(Rs.) : 500  
(Five Hundred only)



Vinita



Shweta Jalan

HF 0032111903

**Statutory Alert:**

The authenticity of this Stamp certificate should be verified at 'www.shcilestamp.com' or using e-Stamp Mobile App of Stock Holding. Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid. The onus of checking the legitimacy is on the users of this certificate. In case of any discrepancy please inform the Competent Authority.





### AFFIDAVIT

I, Vinit Jalan, aged about 39 years, S/o of Ravi Shankar Shyam Sunder Jalan, residing at Flat No: D / 503, 5<sup>th</sup> floor, Aashirwad Avenue, VIP Road, Near Shyam Baba Mandir, Surat-395007, Gujarat, India.

**And**

I, Shweta Jalan, aged about 38 years, W/o of Vinit Jalan, residing at Flat No: D / 503, Ashirwad Avenue, VIP Road, Shyam Mandir, Althan, VTC: Surat, PO: Althan, Surat- 395017, Gujarat, India.

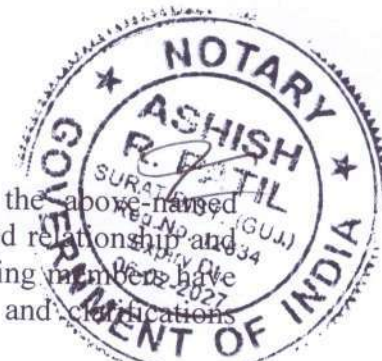
We hereby jointly and solemnly affirm and declare as under:

1. That we are the Promoters and directors of Vinit Mobile Limited ("**the Company**") bearing CIN U51100GJ2011PLC065617, a company incorporated under the Companies Act, 2013/1956, having its registered office at Plot no. 358, Ground, 1st & 2nd floor, Gopal Nagar, Bamroli Althan Expressway, Pandesara, Surat, Gujarat - 394221.
2. That subject to market conditions, receipt of necessary approvals and other considerations, our Company is proposing to undertake the Initial Public Offer. In relation to the Issue, the Company proposes to file the Draft Prospectus (the "**DP**") with SME Platform of recognized Stock Exchange 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**").
3. That Vikaskumar R Jalan and Mamta Saraf unwilling to be identified and included as Promoter Group members in the Issue documents to be filed with the Stock Exchange and Securities Exchange and Board of India ("**the Dissenting Member**").

Vinit

Shweta Jalan



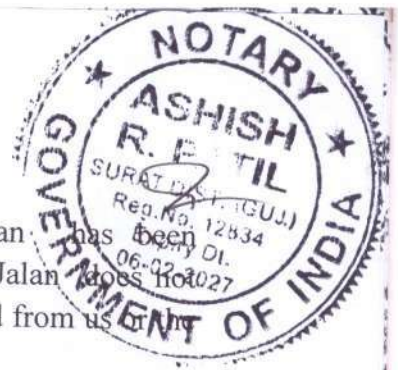


4. That we have a strained and irreconcilable relationship with the above-named dissenting members in our individual capacity. Due to such strained relationship and no-cooperation between the dissenting member and us, the dissenting members have refused to provide the relevant details, documents, declarations and clarifications requested from them.
5. That despite the strained relationship, we made several bona fide attempts in good faith to request and obtain certain necessary information, documents, and records from the dissenting members, which were critical for the purpose of statutory and regulatory disclosures, compliance, and corporate record-keeping. However, the dissenting members have expressively refused or failed to provide such information and documents.
6. That we have documentary evidence and/or records of such attempts including written communications vide registered post and/or emails, which clearly show our intention to obtain cooperation in a lawful and transparent manner.
7. The dissenting members do not have any control or interest or shareholding in the Vinit Mobile Limited. Further, the dissenting members of the promoter group are not associated as a director, key managerial personnel, shareholder, vendor, customer or partner / designated partner with the Company.
8. The dissenting members of the promoter group are not associated with any entity in which we or the Vinit Mobile Limited are an interested party. Furthermore, the dissenting members of the promoter group are not associated with any entities forming part of the Promoter group.
9. The dissenting members do not (directly or indirectly) have any role in the management, business or operations of Vinit Mobile Limited.
10. The dissenting members do not hold any directorship / partnership / shareholding in Vinit Mobile Limited, nor do they have any representative on the board of directors of Vinit Mobile Limited.
11. As on date of this Affidavit, the dissenting members of the promoter group do not have any related party transactions with Vinit Mobile Limited and do not have any special rights with respect to Vinit Mobile Limited through any formal or informal arrangements.
12. The dissenting member Mamta Saraf or her connected entity had not entered into any financial transactions with us or the Vinit Mobile Limited in any form since last 3 financial year and as on the date of affidavit she has no financial transactions outstanding to paid or received from us or the Vinit Mobile Limited. The dissenting member Vikaskumar R Jalan had entered into the financial transactions with promoter Vinit Jalan, Vinit Jalan HUF and Vinit Mobile Limited before the dispute or happening of strained relationship with promoter Vinit Jalan, however all the

Vinit


Mamta Saraf





outstanding dues between the promoter and Vikaskumar R Jalan. has been settled/paid-off and as on the date of this affidavit – Vikaskumar R Jalan does not have any claim or financial transactions outstanding to paid or received from us in Vinit Mobile Limited.

13. Vinit Mobile Limited and our Promoters do not hold, directly or indirectly, any securities in any ventures that have been promoted by the dissenting members and vice versa.
14. The dissenting members have indicated that they are unwilling to provide any information, details or documents related to them as requested. Further they do not agree to take on any legal obligation, nor do they wish to be associated with the Issue or the Company, now or in the future, either as a member of the promoter group of the Company or in any other capacity. Further, the dissenting members 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, the dissenting members 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.
15. There is no proposal whereby the dissenting members will receive any portion of the proceeds from the proposed IPO and there is no material existing or anticipated transaction with them in relation to the utilization of such proceeds. Further, there is no arrangement between the Company and dissenting members pursuant to which the proceeds of the IPO shall be indirectly routed to the dissenting members.
16. We have no objection to the submission of the affidavit to any regulatory and/or statutory authorities as may be required by Vinit Mobile Limited including the Securities and Exchange Board of India and confirm that this affidavit may be relied upon by Vinit Mobile Limited, and any advisors and other parties appointed by Vinit Mobile Limited in respect of the Issue.



Vinito

**DEPONENT(1)**

**Vinit Jalan**

Shweta Jalan

**DEPONENT(2)**

**Shweta Jalan**



We, the abovenamed deponents, hereby verify at Surat on this 08<sup>th</sup> day, of July, 2025 that the contents of this affidavit are correct to best of our knowledge and believed by us to be true and that nothing has been concealed therefrom.



*Vinit*

DEPONENT(1)

Vinit Jalan

*Shweta Jalan*

DEPONENT(2)

Shweta Jalan



*Vinit*



*Shweta Jalan*



BEFORE ME

*Arav*  
ASHISH R. PATIL  
NOTARY  
SURAT DIST. (GUJ.)  
GOVT. OF INDIA

Register Serial No: 2656  
Date:- 09 JUL 2025  
My Commission Expires  
on 01th February 2027



Date: July 9, 2025

To,  
**The Securities and Exchange Board of India**  
 Corporate Finance Department  
 Division of Issues and Listing, SEBI Bhavan BKC,  
 Plot No.C4-A, 'G' Block  
 Bandra-Kurla Complex, Bandra (East),  
 Mumbai - 400051, Maharashtra, India.

Respected Sir/Madam,

**Sub.: Due Diligence Certificate**

**Reference: Exemption under Regulation 300 of SEBI ICDR 2018 from Disclosure of members of Promoter Group (as defined under Regulation 2(1)(pp) of SEBI ICDR 2018) for Proposed SME IPO of Vinit Mobile Limited.**

We have been appointed as the Lead Manager for the SME IPO of M/s Vinit Mobile Limited (*herein after referred as "VML" or "Company"*).

The Company has applied for exemption with SEBI pursuant to Regulation 300 of SEBI ICDR 2018 from disclosure of members of Promoter Group for mere two Immediate relatives as per Regulation 2(1)(pp)(ii) of SEBI ICDR, 2018 i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf (*herein after referred as "Immediate Relatives"*).

Mr. Vinit Jalan & Mrs. Shweta Jalan are the promoters of the Company i.e. M/s Vinit Mobile Limited. (*herein after referred as "Promoters"*)

Further, for your ready reference the relationship between the promoters and their immediate relatives has been set out below:

Sr. No.	Relatives of Promoters as per Regulation 2(1)(pp) of SEBI ICDR, 2018	Relation with Mr. Vinit Jalan (Promoter)	Relation with Mrs. Shweta Jalan (Promoter)
1.	Mr. Vikaskumar R Jalan	Brother	Spouse's Brother
2.	Mrs. Mamta Saraf	Spouse's Sister	Sister



**COMFORT SECURITIES LIMITED**

CIN : U67120MH2002PLCI36562

Registered Office :- A-301, Hetal Arch, S.V. Road,  
 Opp. Natraj Market, Malad (West), Mumbai - 400064

☎ 022- 6894-8500/08

✉ info@comfortsecurities.co.in

🌐 www.comfortsecurities.co.in



**Sources of Information:**

- Joint Affidavit from Mr. Vinit Jalan and Mrs. Shweta Jalan (Promoters);
- Affidavit from Mrs. Mamta Saraf;
- Certificate from a Practicing Chartered Accountant firm confirming non-existence of any outstanding financial transactions with the Company and the Immediate Relatives i.e. Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf;
- Watchout Investor Searches from [www.watchoutinvestors.com](http://www.watchoutinvestors.com) pertaining to Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf;
- CIBIL Report(s) of Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf.

**Brief Note on Process of Due Diligence:**

- We had identified immediate relatives of the Promoters as natural persons forming part of the Promoter Group as per Regulation 2(1)(pp) of SEBI ICDR regulation, 2018. We had asked for the requisite information from the promoters of the Company pertaining to their Immediate Relatives. However, no information of Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf was arranged by promoters of the Company.
- Further, we had also requested Mr. Vikaskumar R Jalan vide courier dated May 28, 2025 and reminder request dated June 24, 2025 and Mrs. Mamta Saraf vide email dated June 25, 2025 and June 30, 2025 and courier dated June 30, 2025 to provide the details, documents, declarations and confirmations for preparation of Issue documents of Vinit Mobile Limited, however we did not receive any direct communication from them regarding the same.
- Further, Mrs. Mamta Saraf, vide her email dated July 1, 2025 and an affidavit dated July 08, 2025 expressly declined to provide any details and documents requested from her. Accordingly, the Promoters, Mr. Vinit Jalan and Mrs. Shweta Jalan, have furnished a joint affidavit dated July 09, 2025 affirming that they share a strained relationship with their immediate relatives, Mr. Vikaskumar R. Jalan and Mrs. Mamta Saraf, and that there are no financial transactions or related party transactions with these individuals that could have any impact on Vinit Mobile Limited. It has also been stated that despite multiple requests addressed to Mr. Vikaskumar R. Jalan seeking the requisite details and documents, the Company has not received any response from him owing to the strained relationship with Promoter Mr. Vinit Jalan.
- Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf do not have any interest in Vinit Mobile Limited and are not involved in the affairs of the Company in any manner whatsoever.
- As per the Watchout Investor Searches on [www.watchoutinvestors.com](http://www.watchoutinvestors.com), it has been observed that there are no defaults on part of Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf, also there does not exist any pending cases against them.



**Based on the affidavits, information and confirmations, we hereby confirm that:**

- Mrs. Mamta Saraf or her connected entity had not entered into any financial transactions with Promoters or M/s Vinit Mobile Limited in any form, since last three (3) financial years and as on the date of affidavit, she has no financial transactions outstanding to be paid or received from Promoters or M/s Vinit Mobile Limited. Mr. Vikaskumar R Jalan had entered into the financial transactions with promoter Mr. Vinit Jalan and M/s Vinit Mobile Limited before the dispute or happening of strained relationship with promoter Mr. Vinit Jalan, however all the outstanding dues between the promoter, Company and Mr. Vikaskumar R Jalan has been settled/paid-off and as on the date of this application – Mr. Vikaskumar R Jalan does not have any claim or financial transactions outstanding to be paid or received from Promoters or the M/s Vinit Mobile Limited.
- Mr. Vikaskumar R Jalan and Mrs. Mamta Saraf are not interested in the business of Company through Equity, Debt or as a Vendor or Supplier or client.
- There is no proposal whereby these immediate relatives will receive any portion of the proceeds from the proposed IPO of Vinit Mobile Limited and there are no material existing or anticipated transactions with them in relation to the utilization of such proceeds. Further, there is no arrangement between the Company and them pursuant to which the proceeds of the IPO shall be indirectly routed to these dissenting members of the Promoter Group.
- They are neither having any role in the management, business or operations of Vinit Mobile Limited or its connected entities nor in any of the entities forming a part of the promoter group of Vinit Mobile Limited.
- They are neither on the board of directors of Vinit Mobile Limited or its connected entities or the entities forming a part of the promoter group of the Company nor they have any representative(s) on the board of directors of Vinit Mobile Limited.
- They neither hold any equity shares or securities of any other class of Vinit Mobile Limited, nor they are a vendor or a supplier or a client of Vinit Mobile Limited or any of its connected entities.
- Further, as on date of this certificate, they do not have any related party transactions with Vinit Mobile Limited and do not have any special rights with respect to Vinit Mobile Limited through any formal or informal arrangements.

The statements, information, and confirmations contained in this Due Diligence Certificate have been obtained and collated by us solely for the purpose of compliance with the provisions the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (“SEBI ICDR Regulations”). This certificate is based on information, documents, and representations made available to us by the Company, its Promoters, Directors, and other persons concerned. While we have exercised due care and diligence in verifying the accuracy and adequacy of such information to the best





of our knowledge and belief, we do not assume any responsibility for the veracity, completeness, or authenticity of information provided by independent third parties or external sources. This Certificate is issued exclusively for submission to the Securities and Exchange Board of India in connection with the proposed public offering and the exemption application under Regulation 300 of the SEBI ICDR Regulations, and shall not be used, quoted, or referred to for any purpose or by any person other than as contemplated under the applicable regulations, without our prior written consent.

**For and on behalf of Comfort Securities Limited**



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**Alok Prasad**  
**Compliance Officer**

**Date:** July 09, 2025

**Place:** Mumbai



# VINIT MOBILE LIMITED

(Formerly known as Vinit Mobile Pvt. Ltd.)

CIN: - U51100GJ2011PLC065617 GST No.: - 24AADCT8502E1ZN

**Address:** - Ground, 1<sup>st</sup> & 2<sup>nd</sup> Floor, P No. 358, Gopal Nagar, Bamroli Althan Express Way Road, Surat, Gujarat 394221  
**Contact No.** +91-9998714990 **Website:** - www.vinitmobile.com **Email Id:** - info@vinitmobile.com

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF VINIT MOBILE LIMITED ("THE COMPANY") HELD ON TUESDAY, JULY 08, 2025, AT 11.00 AM, AT THE REGISTERED OFFICE OF THE COMPANY SITUATED AT PLOT NO. 358, GROUND, 1ST & 2ND FLOOR, GOPAL NAGAR, BAMROLI ALTHAN EXPRESSWAY, PANDESARA, SURAT, GUJARAT - 394221.**

## APPROVAL FOR FILING OF SEBI EXEMPTION:

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, few members of Promoter group 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 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 several request letters have requested 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 Mr. Vikaskumar R Jalan (brother of Promoter; Vinit Jalan) and received an affidavit for non-association with the Company from Mrs. Mamta Saraf (Sister of Promoter; Shweta Jalan) to members of the promoter group (herein after called as **"dissenting members"**), further they are neither willing to be identified as promoter group nor willing to provide any information regarding the same. Thus, the Company needs to file an application with SEBI for non-inclusion of such dissenting members of promoter group in the issue documents.

**RESOLVED FURTHER THAT** any director and 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 Vinit Mobile Limited  
(Formerly known as Vinit Mobile Private Limited)



Vinit Jalan  
Director  
DIN: 08666210  
Date: 08<sup>th</sup> July 2025  
Place: Surat



The payment made to SEBI on Wed Jul 09 15:32:38 IST 2025 for amounting **118000** with payment reference id **BHDF0RH0PV5ZT4** and bank reference id 2519089214388 is in **SUCCESS** state. You can view the payment details by visiting "Payment History" tab on Payments Page.



## Payment History

Payment Form Payment History

PAN

AADCT8502E

Email

info@hbmhbm.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	VINIT MOBILE LIMITED	24AADCT8502E12N	Gujarat	Exemption Fee - Regulation 300 of ICDR	100000	NO	0	0	18000	118000	Payment Confirmed	09-07-2025	BH-OF08H-OPV5Z74

Showing 1 to 1 of 1 entry

1