

Steelman Telecom Limited

(Formerly Known as Steelman Telecom Private Limited)



Date:15.04.2024

To,
The Manager
Corporate Relationship Department
Bombay Stock Exchange Limited
1st Floor, New Trading Wing,
Phiroze Jeejeebhoy Tower
Dalal Street, Fort, Mumbai-400001

Scrip Code: BSE: 543622

Dear Sir/Madam,

Subject: Undertaking for Non- Applicability of Corporate Governance for the quarter ended31.03.2024

With reference to the captioned subject, this is to inform you that M/S Steelman Telecom Limited, fulfills the criteria for non-applicability as outlined in Regulation 15(2)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, given that its specified securities are listed on the Bombay Stock Exchange of India Limited (SME Emerge Platform)

In adherence to the exemption granted under Regulation 15(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we wish to inform you that the Corporate Governance provisions are not applicable to the company under Regulations 27(2) of the ("Listing Regulations, 2015") for the quarter ended March 31, 2024, as well as for the financial year 2024-25.

Further, in terms of master circular of Listing Regulations, 2015 bearing circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023, a certificate from practicing professional is enclosed herewith.

Kindly take this on your record please.

Thanking You,

Yours faithfully,

For STEELMAN TELECOM LIMITED
(Formerly Known as Steelman Telecom Private Limited)

APARUPA DAS
(Company Secretary & Compliance officer)
Meb No:42450



Saurabh Basu

ACS, ACMA, MBA (Fin)
Practising Company Secretary
Insolvency Professional

S BASU & ASSOCIATES

Company Secretaries
Code No.- S2017WB456500
10/6/2 Raja Rammohan Roy Road,
3rd Floor, Kolkata - 700008

CERTIFICATE ON COMPLIANCE WITH THE REGULATIONS OF CORPORATE GOVERNANCE

I, Saurabh Basu, Company Secretary in Practice, have examined the compliance of conditions of Corporate Governance by **Steelman Telecom Limited** (CIN L55101WB2003PLC096195) ("the Company") for the year ended on 31st March 2024, as stipulated in Regulations 17 to 27 and clauses (b) to (i) and (t) of regulation 46(2) and paras C and D and E of Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments from time to time (the "Listing Regulations") read with Regulation 15(2) of Listing Regulation.

MANAGEMENT'S RESPONSIBILITY

The compliance of conditions of Corporate Governance is the responsibility of the Management. This responsibility includes the design, implementation and maintenance of internal control and procedures to ensure compliance with the conditions of the Corporate Governance stipulated in the Listing Regulations.

AUDITOR'S RESPONSIBILITY

My responsibility is limited to examining the procedures and implementation thereof adopted by the Company for ensuring compliance with the conditions of the Corporate Governance. It is neither an audit nor an expression of opinion on the viability or financial position of the Company.

I have examined the relevant records and documents maintained by the Company, as provided for the purposes of providing reasonable assurance on the compliance with Corporate Governance requirements by the Company.



Continuation Sheet

S BASU & ASSOCIATES
Company Secretaries
Code No.- S2017WB456500

OPINION

Based on my examination of the relevant records and according to the information and explanations provided to me and the representations provided by the Management, I certify that :

- a) The Company has listed only its Equity Shares on SME Platform of BSE Ltd (BSE SME)
- b) As per Regulation 15(2) of Listing Regulations, the Company has exempted with the conditions of Corporate Governance as stipulated in Regulations 17 to 27 and Clauses (b) to (i) and (t) of regulation 46(2) and paras C , D and E of Schedule V of the Listing Regulations during the year ended 31st March 2024.

S Basu & Associates
Company Secretaries
Firm Registration No : S2017WB456500

Place: Kolkata

Date: 15.04.2024

Membership No. ACS18686 CP No: 14347
Peer Review No : 1017/2020
UDIN:A018686F000125617

