



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

**The Board of Directors,
STEELMAN TELECOM LIMITED
MANI CASADONA, FLAT NO 15E1, FLOOR NO-15,
PLOT NO-IIF/04, STREET NO-372, ACTION AREA-IIF,
NEW TOWN, KOLKATA-700156**

**SECRETARIAL AUDIT REPORT ON CAPITAL RECONCILIATION
QUARTER ENDED 30TH SEPTEMBER, 2025**

We have examined the digital information such as Registers of Members, beneficiary details furnished by the Depositories and other records/documents maintained by **STEELMAN TELECOM LIMITED** (the Company) **CIN: L55101WB2003PLC096195**, having Authorized Capital: Rs. 11,00,00,000 having its Registered Office at **Mani Casadona, Flat No 15E1, Floor No-15, Plot no-IIF/04, Street No-372, Action Area-IIF, New Town, Kolkata-700156**, and its Registrar and Share Transfer Agent, **Bigshare Services Private Limited, Reg Off: Pinnacle Business Park, Office no S6-2, 6th floor, Mahakali Caves Road, Next to Ahura Centre, Andheri East, Mumbai, Maharashtra-400093 (RTA)**, for issuing this certificate, in accordance with circular no. D&CC/FITC/CIR-16/2002 dated 31st December, 2002 issued by the Securities Exchange & Board of India as per Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018.

In our opinion and to the best of our knowledge and according to the information and explanation given to us by the RTA and based on such verification as considered necessary, we certify:

That the total equity shares held in NSDL, CDSL and in physical form tally with the issued / paid-up capital as per details given in Format annexed thereto. That the Register of members was updated. That as reported by RTA dematerialization requests received during the quarter ended 30th September, 2025 have been confirmed within 21 days from the date of receipt and there were no requests pending beyond 21 days.

That there was no change in the capital of the company during the quarter ended 30th September, 2025. That the company has appointed common agency for its share registry work.

**Place: Kolkata
Date: 16.10.2025**

**For S Basu & Associates
Company Secretaries
Firm Registration No : S2017WB456500**


**Saurabh Basu
Practising Company Secretary
ACS: 18686 ; C.P.: 14347
Peer Review No : 1017/2020
UDIN: A018686G001586142**

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Saurabh Basu

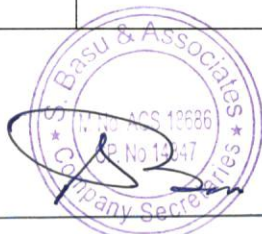
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RECONCILIATION OF SHARE CAPITAL AUDIT UNDER REGULATION 76 OF SEBI (DEPOSITORIES AND PARTICIPANTS) REGULATIONS, 2018

For Quarter Ended	30.09.2025	
ISIN	INEOMSK01016	
Face Value	Rs 10/- per share (Equity)	
Name of the company	Steelman Telecom Limited	
Registered Office Address	Mani Casadona, Flat No 15E1, Floor No-15, Plot no-IIF/04, Street No-372, Action Area-IIF, New Town, Kolkata-700156	
Correspondence Address	Same as above	
Telephone & Fax Nos.	+91 8443022233	
E-Mail Address	cs@steelmantelecom.com	
Names of the Stock Exchanges where the company's securities are listed	BSE SME Platform	
	Number of shares	% of Total Issued Capital
Issued Capital	9676200	100
Listed Capital BSE SME Platform	9676200	100
	Number of shares	% of Total Issued Capital
Held in dematerialized form in CDSL	8267400	85.44
Held in dematerialized form in NSDL	1408800	14.56
Physical	0	0
Total Number of shares (12+13+14)	9676200	100
Reasons for difference, if any, between 10 & 11 and 11 & 15	Nil	



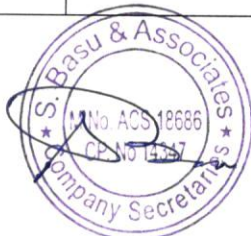
Continuation Sheet

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Certifying the details of changes in share capital during the quarter under consideration as per table below						
****Particulars	No. of shares	Applied and awaiting listing	Listed on Stock Exchanges (Specify Names)	Whether intimated to CDSL	Whether intimated to NSDL	principal approval pending for stock exchange (Specify Names)
Not Applicable						
****Rights, Bonus, Preferential Issue, ESOPs, Amalgamation, Conversion, Buyback, Capital Reduction, Forfeiture, any other (to specify)						
Register of members is updated (Yes / No)				Yes		
If not, updated up to which date				NA		
Reference of previous quarter with regards to excess dematerialized shares, if any				None		
Has the Company resolved the matter mentioned in point no. 19 above in the current quarter?. If not, reason why?				NA		
No. of requests, if any, confirmed after 21 days and the total no. of request pending beyond 21 days with the reasons for delay:						
Total No. of Demat requests		No. of requests	No. of shares	Reasons for delay		
Confirmed after 21 days		None	Nil	N.A		
Pending for more than 21 days		None	Nil	N.A		
Name, Telephone & Fax No. of the Compliance Officer of the Company			Ms Aparupa Das +91 8443022233			
Name, Address, Tel. & Fax No., C. P. No. of the Practicing Company Secretary			CS Saurabh Basu Practicing Company Secretary S Basu & Associates 10/6/2, Raja Rammohan Roy Road Kolkata-700008 Mobile No: 9830063501 Email: pcs.saurabhbasu@gmail.com Mem. No. ACS18686 CP No: 14347			



Continuation Sheet

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	Appointment of common agency for share registry work (if yes, name & address)	Bigshare Services Private Limited, Registered Office: Pinnacle Business Park, Office no S6-2 ,6th floor, Mahakali Caves Road , Next to Ahura Centre, Andheri East, Mumbai, Maharashtra- 400093.
	Any other details that the Practising Company Secretary may like to provide. (E.g., BIFR Company, delisting from SE, Company changed its name etc.)	NA

For S Basu & Associates

Company Secretaries

Firm Registration No : S2017WB456500

**Place: Kolkata
Date: 16.10.2025**



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Practising Company Secretary
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