



## 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,  
3<sup>rd</sup> Floor, Kolkata - 700008

### COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30.06.2025

[Pursuant to Securities and Exchange Board of India  
(Prohibition of Insider Trading) Regulations, 2015]

I, Saurabh Basu, Practising Company Secretary appointed by **STEELMAN TELECOM LIMITED** (name of listed entity) am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) and I certify that

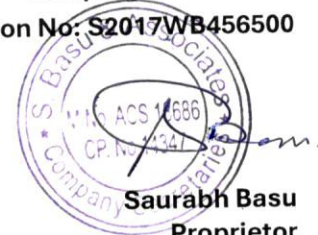
1. The Company has a Structured Digital Database in place
2. Control exists as to who can access the SDD
3. All the UPSI disseminated in the previous quarter have been captured in the Database
4. The system has captured nature of UPSI along with date and time
5. The database has been maintained internally and an audit trail is maintained
6. The database is non-tamperable and has the capability to maintain the records for 8 years.

I also confirm that based on the information shared by the Management, the Company was required to capture 1 number of events during the quarter ended 30<sup>th</sup> June, 2025 and has captured 1 number of the said required events. The Company has maintained and complied with the SDD in respect of the Unpublished Price Sensitive Information for the Quarter and Financial Year ended 30<sup>th</sup> June, 2025.

I would like to report that the no non-compliance(s) was observed in the previous quarter : Not Applicable

Place: Kolkata  
Date: 14.07.2025

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



Saurabh Basu  
Proprietor  
ACS: 18686; C.P.: 14347  
Peer Review No: 1017/2020  
UDIN: A018686G000772197

**Note: The above report is based on an inspection of Software maintain by the Company for SDD**