

Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



Dated: 17.04.2026

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,

Sub: Submission of Certificate Pursuant to Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for the Quarter ended 31st March, 2026.

Please find enclosed certificates pursuant to Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for quarter ended 31st March, 2026, given by the Company Secretary cum Compliance officer of the Company and obtained from PCS Mr. Saurabh Basu, having C.P No: 14347, certifying that the Company is compliant with Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereof for the Financial Year ended 31st March, 2026. SDD certificates has been enclosed herewith, which is self-explanatory.

Kindly take this on your record please.

Thanking You,
Yours faithfully,

FOR STEELMAN TELECOM LIMITED
(Formerly Steelman Telecom Pvt Ltd)

APARUPA DAS
(Company Secretary & Compliance Officer)
Mb No:42450

Encl: as above

Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST MARCH 2026

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

I, **Aparupa Das**, Compliance Officer of **M/S Steelman Telecom Limited**, 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 the Company was required to capture **2** number of events during the quarter ended and has captured **2** number of the said required events.

NOTE:

The Company has been listed in the BSE-SME platform as on dated 10.10.2022 and our first-time quarterly basis SDD compliance starts from the December quarter ended 2022.

FOR STEELMAN TELECOM LIMITED

APARUPA DAS
(COMPANY SECRETARY & COMPLIANCE OFFICER)
ACS: 42450

DATE: 17.04.2026
PLACE: KOLKATA



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

COMPLIANCE CERTIFICATE FOR THE FINANCIAL YEAR ENDED 31.03.2026

*[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 financial year from 1st April, 2025 till 31st March, 2026 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 2 (Two) number of events during the financial Year ended 31st March, 2026 and has captured 2 (Two) 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 Financial Year ended 31st March, 2026.

I would like to report that the following noncompliance(s) was observed in the previous quarter or financial year ended and remedial action (s) taken along with timelines in this regard : Not Applicable

Place: Kolkata
Date: 17.04.2026

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



Saurabh Basu
Proprietor
ACS: 18686; C.P.: 14347
Peer Review No: 7404/2025
UDIN: A018686H000132085

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