

# Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



Dated: 14.07.2025

To,  
The Manager  
Corporate Relationship Department  
**Bombay Stock Exchange Limited**  
1<sup>st</sup> 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 30<sup>th</sup> June, 2025.**

Please find enclosed certificates pursuant to Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for quarter ended 30<sup>th</sup> June, 2025 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. 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

Digitally signed by APARUPA DAS  
DN: c=IN, cn=PERSONAL,  
email=aparu@steelmantelecom.com, o=Steelman Telecom Limited,  
2.5.4.20=f8e9d3d3a45c40944d404bb13bee7edaf4b254ab18  
4460c5c572b49f5c, postalCode=700051, st=WEST BENGAL,  
serialNumber=948391d823c5e613f10329438c66d6bb79f79e  
d7a4b7f68e865cac72b1, cn=APARUPA DAS  
Date: 2025.07.14 16:24:49 +05'30'

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

**Encl: as above**

**Corporate Office:** Mani Casadona, Flat No 15E1, Floor No-15, Plot No-IIF/04, Street No-372, Action Area-IIF, New Town,  
Kolkata-700156. Website: [www.steelmantelecom.com](http://www.steelmantelecom.com) | Email: [contact@steelmantelecom.in](mailto:contact@steelmantelecom.in) | Phone No. +91-  
84430222333 | CIN No. L55101WB2003PLC096195

# Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30<sup>th</sup> JUNE 2025

(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 **1** number of events during the quarter ended and has captured **1** 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  
Digitally signed by APARUPA DAS  
DN: cn=APARUPA DAS  
serialNumber=105875649199100240207545,  
c=IN, o=STEELMAN TELECOM LIMITED, ou=STEELMAN TELECOM LIMITED, email=aparupa.das@steelmantelecom.com, postalCode=700051, st=WEST BENGAL,  
serialNumber=105875649199100240207545, cn=APARUPA DAS  
Date: 2025.07.14 16:29:46 +05'30'

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

**DATE: 14.07.2025**  
**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,  
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.

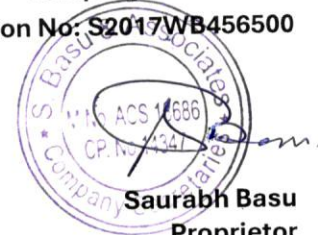
I also confirm that based on the information shared by the Management, the Company was required to capture 1 number of events during the quarter ended 30<sup>th</sup> June, 2025 and has captured 1 number of the said required events. The Company has maintained and complied with the SDD in respect of the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