

Steelman Telecom Limited

(Formerly Known as Steelman Telecom Private Limited)



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER 2023

(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: 13.10.2023
PLACE: KOLKATA