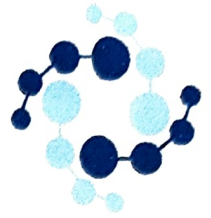


Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



Conflict of Interest Policy

1. Brief and Purpose

Our Company - Steelman Telecom Limited, Conflict of Interest Policy refers to any situation in which an employee's personal interests conflict with those of the company for which they work. This is an undesirable situation since it may have a negative impact on the employee's judgment and dedication to the firm, and thus on the organization's ability to achieve its objectives.

A conflict of interest arises when an employee's personal interests, financial or otherwise, conflict with the interests of the company. This can include situations where an employee's judgment or actions may be influenced by personal considerations, potentially compromising the company's best interests.

This policy will lay out the procedures for dealing with conflicts of interest, as well as the roles of employees and the company in resolving any issues that arise.

2. Scope

This company's conflict of interest policy applies to all future and existing employees, as well as independent contractors, third party vendors and anyone acting on the company's behalf. All employees are expected to conduct themselves in a manner that avoids real or perceived conflicts of interest. Employees must prioritize the company's interests above their personal interests.

3. DEFINITIONS & Applicability

3.1 Employee - someone hired by Steelman Telecom Limited on a part-time or full-time basis in conformity with its present geographical state's labor rules.

3.2 Agent - an owner, stakeholder, director, contractor, or other third-party with authority to act on Steelman Telecom Limited behalf.

3.3 Financial Interest - Any individual's financial interest in Steelman Telecom Limited monetary transactions. Any interest that could have a direct impact on the individual's financial gain or loss.

3.4 Conflict of Interest - A situation in which an employee's personal interests interfere, or appear to interfere, with the interests of Steelman Telecom Limited.

4. PROCEDURES

4.1 Obligation to disclose:

Every Steelman Telecom employee/agent is required to report any known or perceived conflicts of interest as soon as they emerge. Failure to do so could result in your employment being terminated.

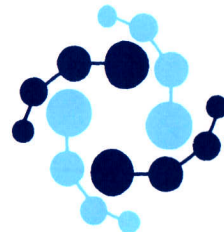
4.2 Looking into potential conflicts

When a potential conflict of interest develops, the board of directors will gather all relevant facts and may interview any parties involved. If the board concludes that there is a disagreement, efforts will be taken to resolve it. If there is no dispute, the investigation will be documented but no further action will be taken.



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4.3 Dealing with potential conflicts of interest

Any transactions that may have been affected will be evaluated retroactively if an actual conflict of interest is discovered. Affected individuals shall be contacted both inside and outside the company, including shareholders, directors, employees, and contractors. The board of directors will also conduct an inquiry to assess the scope of the conflict, and the intentions of the people involved.

If a member or members of the board of directors are involved in the disagreement, they will be excused from the deliberations.

5. Specific Prohibitions:

- **Personal Financial Interests:** Employees must disclose any significant financial interest, direct or indirect, in any company or organization that does business with or competes with the company.
- **Outside Employment:** Employees must obtain prior written approval for any outside employment or consulting activities that may conflict with their company duties.
- **Gifts and Gratuities:** Employees must not accept gifts, gratuities, or favors from suppliers, customers, or business partners that could influence their judgment or decision-making.
- **Use of Company Resources:** Employees must not use company resources, such as time, equipment, or information, for personal gain or benefit.
- **Insider Trading:** Employees must not engage in insider trading or other forms of securities fraud.
- **Family Relationships:** Employees must disclose any familial relationships with other employees or business partners that could potentially lead to a conflict of interest.

6. Disclosure and Reporting:

- **Disclosure:** Employees must promptly disclose any potential or actual conflict of interest to their line manager or the Human Resources department.
- **Reporting:** Employees are encouraged to report any suspected violations of this policy to their supervisor, HR, or the appropriate ethics hotline at compliance@steelmantelecom.com

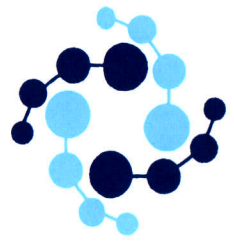
7. Mitigation Strategies:

- **Recusal:** In cases of potential conflict of interest, employees may be required to recuse themselves from decisions or activities related to the conflict.
- **Divestiture:** Employees may be required to divest themselves of financial interests that could create a conflict.
- **Transparency:** Open and transparent communication is essential to identify and address potential conflicts.



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8. Whistleblower Protection:

Employees who report potential conflicts of interest or violations of this policy in good faith will be protected from retaliation. Confidentiality will be maintained to the fullest extent possible.

9. DISCIPLINARY CONSEQUENCES

Because all conflicts of interest will be assessed on a case-by-case basis, disciplinary action may be taken. The board of directors has complete authority over what disciplinary action, including suspension and/or termination of employment, is appropriate and required.

10. Review and Update: This policy will be reviewed and updated periodically to ensure its continued effectiveness and compliance with applicable laws and regulations.

By adhering to this policy, employees can help maintain the company's reputation for integrity and ethical conduct.

By The Order of the Board
For Steelman Telecom Limited
Steelman Telecom Limited

Director

Mahendra Bindal
(Managing Director)
DIN: 00484964