S. Patwari & Associates

Company Secretaries (A Peer Reviewed Unit)
Email-spatwariassociates2015@gmail.com

20B Abdul Hamid Street, Ground Floor
Room No-28, Kolkata-700069
Mobile: +91 8013871145

ANNEXURE - IV

The Chief General Manager
Listing Operation,
BSE Limited,
20th Floor, P. J.Towers,
Dalal Street,
Mumbai – 400 001.

Dear Sir,

Sub: Application for "In-principle approval" prior to issue and allotment of 28,23,800 (Twenty-Eight Lakhs Twenty-Three Thousand Eight Hundred) Equity Share Warrants to be issued on a preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, S. Patwari & Associates, Company Secretaries have verified the relevant records and documents of M/s Steelman Telecom Limited with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

a) None of the proposed allottee(s) has/ have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date.

b) M/s Aumit Capital Advisors Limited does not hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment. However, Mr. Mahendra Bindal, Mr. Mayank Bindal, Mrs. Deep Shikha Bindal & Ms. Saloni Bindal are pre-issue shareholders of the issuer company before the relevant date.

c) The pre-preferential shareholding of each of the proposed allottees has been locked in accordance with Regulation 167(6) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018. The pre-preferential shareholding of the proposed allottees has been locked in from 22nd June 2026 to 31st March 2027. Further, there has been no sale or pledge of the pre-preferential shareholding of

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the proposed allottees during the aforesaid lock-in period. The details of the allottee-wise pre-preferential shareholding and lock-in thereof are set out below:

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Mahendra Bindal	1206640000040316	10,15,050	22.06.2026	31.03.2027	NA	NA
Mayank Bindal	1206640000040563	25,84,800	22.06.2026	31.03.2027	NA	NA
Deep Shikha Bindal	1206640000040388	3,73,950	22.06.2026	31.03.2027	NA	NA
Saloni Bindal	1206640000040369	7,47,900	22.06.2026	31.03.2027	NA	NA
Aumit Capital Advisors Limited	1208160025183415	0	NA	NA	NA	NA

(*) client id/ folio no in case allottee hold the securities in physical form

d) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.

e) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62 of the Companies Act 2013 and Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and other requirements of Companies Act, 2013. Further, the company has complied with all legal and statutory formalities and no statutory authority has restrained the company from issuing these proposed securities.

f) The proposed preferential issue is being made in compliance with the provisions of Memorandum of Association (MOA) and Article of Association (AOA) of the company. It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined in compliance with the valuation requirement prescribed under Regulation 164 of Chapter V of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018."

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g) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same Financial Year i.e., F.Y 2026-2027 is more than 5% of the post issue fully diluted share capital of the issuer.

OR

~~The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2026-27 is less than 5% of the post issue fully diluted share capital of the issuer.~~

For **S. Patwari & Associates**
Company Secretaries
(A Peer Reviewed Firm)
FRN-S2015WB313000

S. Patwari & Associates ★ Kolkata ★ Company Secretaries

FCS Sweta Patwari
Practising Company Secretary
FCS-13163
CP No-9446

UDIN: - **F013163H001167151**
Date: 20.08.2026
Place: Kolkata