



**SHANU MATA  
& ASSOCIATES**  
Company Secretaries

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31<sup>st</sup>, 2024  
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading)  
Regulations, 2015)**

I Shanu Bhagwandas Mata, Practicing Company Secretary appointed by M/s Newmalayalam Steel 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 NIL\* number of events during the quarter ended December 31<sup>st</sup>, 2024 and has captured NIL number of the said required events.

**For,  
Shanu Mata and Associates  
Company Secretaries**

**Shanu Bhagwandas Mata  
Membership No- F12161  
CP No- 17999**

Place-Mumbai  
Date- 20<sup>th</sup> January, 2025



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*\*Note:* The Company was listed on the Emerge Platform of the National Stock Exchange (NSE) on December 27, 2024. The software for maintaining the Structured Digital Database (SDD) was installed on December 24, 2024. Consequently, there were no entries available for the previous quarter, i.e., the period from October 1, 2024, to December 31, 2024, as the SDD became operational only after the stated installation date.