



**SHANU MATA
& ASSOCIATES**
Company Secretaries

**COMPLIANCE CERTIFICATE FOR THE FINANCIAL YEAR ENDED MARCH 31st, 2025
(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 (formerly known as Newmalayalam Steel Private 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~~ financial year 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 03 number of events during the Financial Year Ended March 31st, 2025 and has captured 03 number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous financial year and the remedial action(s) taken along with timelines in this regard: **NIL**

For,
Shanu Mata and Associates
Company Secretaries

Shanu Bhagwandas Mata
Membership No- F12161
CP No- 17999
UDIN: F012161G000503102
Place-Mumbai
Date- 30th May, 2025