



Phoenix Overseas Limited

Three Star Export House  
CIN: L15314WB2002PLC095587

Registered Office Address :  
13-B, Bidhan Sarani, Kolkata - 700006  
West Bengal, India

**Dated: 13<sup>th</sup> Day of January, 2025**

To  
The Listing Department  
National Stock Exchange of India Ltd.  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East), Mumbai - 400 051

**Sub: SDD Compliance certificate for the Quarter ended 31<sup>st</sup> December, 2024**

**Ref: Phoenix Overseas Limited (Symbol: PHOGLOBAL)**

Dear Sir/Madam,

Pursuant to provisions of Regulation 3(5), 3(6) and other applicable provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find enclosed the Structured Digital Database (SDD) Compliance Certificate for the Quarter ended 31st December, 2024 furnished by Twinkle Pandey, Practising Company Secretary.

You are requested to take the same on your record.

Thanking You

Yours faithfully

For **Phoenix Overseas Limited**

**Abhishek Chakraborty**  
Company Secretary & Compliance officer  
Membership No: A60134

(Company Secretary in Practise)

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31<sup>ST</sup> DECEMBER, 2024**

*(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)*

I, Twinkle Pandey, Practising Company Secretary appointed by M/s. Phoenix Overseas Limited (CIN: L15314WB2002PLC095587) 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:

<b>SL. No</b>	<b>Compliance Requirement</b>	<b>Yes/No</b>	<b>Observation/Remarks</b>
<b>1.</b>	The Company has a Structured Digital Database in place.	Yes	The Company has in place its Structured Digital Database.
<b>2.</b>	Control exists as to who can access the SDD	Yes	Absolute control exists as the Name, Designation and PAN of the persons who have access to Structured Digital Database is captured in the system.
<b>3.</b>	All the UPSI disseminated in the previous quarter have been captured in the Database	Yes	The Company has not entered into any transaction during the quarter ended as on 30th September, 2024. As the Company has received its Listing approval on 26th September, 2024.
<b>4.</b>	The system has captured nature of UPSI along with date and time	Yes	The System of the Company has captured nature of UPSI along with Date and Time.
<b>5.</b>	The database has been maintained internally and an audit trail is maintained.	Yes	The Company has maintained the database internally and an audit trail is also maintained
<b>6.</b>	The database is non-tamperable and has the capability to maintain the records for 8 years	Yes	The database is non temperable and has the capability to maintain the records for 8 years.

(Company Secretary in Practise)

I also confirm that based on the information shared by the management, the Company has maintained complied with the Structured Digital Database in respect of the unpublished price sensitive information for the quarter ended 31st December, 2024.

**TWINKLE** Digitally signed  
by TWINKLE  
**PANDEY** PANDEY

**Twinkle Pandey**  
**Practising Company Secretary**  
**Membership No.: 49208**  
**CP No.: 22187**  
**UDIN: A049208F003661047**  
**Peer Review Certificate No.**  
**2088/2022**

**Date: 11.01.2025**  
**Place: Durgapur**

*Note: The above report is based on an online inspection of Software maintained by the company for SDD.*