



Phoenix Overseas Limited

Three Star Export House
CIN: L15314WB2002PLC095587

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

Dated: 20th day of January, 2026

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 31.12.2025

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, 2025 furnished by Twinkle Pandey, Practicing Company Secretary.

You are requested to take the same on your record.

Thanking You
Yours faithfully

For **Phoenix Overseas Limited**

APARES Digitally signed by
APARESH NANDI
H NANDI Date: 2026.01.20
17:56:54 +05'30'

Aparesh Nandi
Managing Director
DIN: 00722439

(Company Secretary in Practise)

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2025

(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) I 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:

SL. No	Compliance Requirement	Yes/No	Observation/Remarks
1	The Company has a Structured Digital Database in place.	Yes	The Company has in place its Structured Digital Database.
2	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.
3	All the UPSI disseminated in the previous quarter have been captured in the Database	Yes	As the company is Listed on SME platform as per Regulation 33(5) quarterly submission of Financial statement is not applicable for a listed entity which had listed their Securities on SME exchange. For the Half year 30 th September, 2025. The company has duly complied with the provision.
4	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.
5	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.
6	The database is non-tamperable and has the capability to maintain the records for 8 years	Yes	The database is non tamperable and has the capability to maintain the records for 8 years.

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, 2025.

TWINKLE
PANDEY

Digitally signed by TWINKLE
PANDEY
Date: 2026.01.20 17:42:54 +05'30'

Twinkle Pandey
Practising Company Secretary
Membership No.: 49208
CP No.: 22187
UDIN: A049208G003393813
Peer Review Certificate No. 2088/2022
Date: 20.01.2026
Place: Durgapur

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