



Phoenix Overseas Ltd.

(Formerly Phoenix Overseas Pvt. Ltd.)

A Govt. Recognised 'Trading House' A SEDEX Certified Company

CIN No. U15314WB2002PLC095587

Regd Office 13-B Bidhan Sarani, Chanda Plaza (4th Floor), Kolkata - 700 006

Dated: 19th Day of October, 2024

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 30 September 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 30 September 2024.

You are requested to take the same on your record.

Thanking You

Yours faithfully

For **Phoenix Overseas Limited**

**ABHISHEK
CHAKRAB
ORTY**

Digitally signed by ABHISHEK CHAKRABORTY
DN: c=IN, postalCode=700105, st=WEST BENGAL,
street=NOORTH 24 FARGANAL, ln=NOORTH 24
FARGANAL, ou=Personal,
serialNumber=706096070088014336632022956,
c=IN, cn=ABHISHEK CHAKRABORTY,
pseudoym=3595a351e1a342e499c40311954999
90,
2.5.4.20-08040604c37c5c040c19964953b3005
506c43396808607050909c7c,
email=C=PHXGLOBAL.NET, ou=ABHISHEK
CHAKRABORTY
Date: 2024.10.19 17:43:13 +05'30'

Abhishek Chakraborty
Company Secretary & Compliance officer
Membership No: A60134

ALL SUBJECT TO KOLKATA JURISDICTION

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER, 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: U15314WB2002PLC095587) 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	Not Applicable.
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 temperable 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 received its Listing approval on 26th September, 2024. Further, the Company has not entered into any transaction during the quarter ended as on 30th September, 2024.

Twinkle Pandey

(Company Secretary in Practise)

TWINKLE | Digitally signed
PANDEY | by TWINKLE
PANDEY | PANDEY

Twinkle Pandey
Practising Company Secretary
Membership No.: 49208
CP No.: 22187
UDIN: A049208F001646551
Peer Review Certificate No. 2088/2022

Date: 19.10.2024

Place: Durgapur

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