

May 19, 2015

To
National Stock Exchange of India Limited,
MUMBAI – 400 051.

Sir,

Sub: Code of Conduct in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

This is for your information and records.

Thanking you,

Yours faithfully,
For Northgate com Tech Limited

T. Naresh Kumar

T.Naresh Kumar
Director



NORTHGATE COM TECH LIMITED

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

The Code shall be effective from May 15, 2015