



Notice - Closure of Trading Window

Ref. No. - NSTL/ SEC/ TW-4

Dated: 07.01.2019

Pursuant to Company's Code of Practices & Procedure for Fair Disclosures and Code of Conduct to Regulate and Monitor Trading ("Code"), the Trading Window for trading in the shares of the Company will remain closed from January 9, 2019 till January 26, 2019, for all Designated Persons including their immediate relatives. The Code is available under the link 'Investors Relations' at the website of the Company at <https://newgensoft.com>

All the Designated Persons and their immediate relatives are prohibited to enter/deal in any transaction involving sale or purchase or pledge of shares of the Company during the period of closure of Trading Window.

No employee or insider shall deal in the shares of the Company while in possession of Unpublished Price Sensitive Information.

Sd/-

Aman Mourya
Company Secretary

Definitions:

1. **"Trading"** means and includes subscribing, buying, selling, pledging or dealing, or agreeing to subscribe, buy, sell, deal in equity shares of the Company.
2. **"Designated Persons"** means, collectively, the Director(s), Promoters and Promoter Group, Designated Employees and the Connected Person(s) designated on the basis of their functional role in the Company.
3. **"Designated Employee"** shall mean: - (i) Managing Director, Whole-time Director, Key Managerial Personnel and All employees in the grade of Associate Vice President ("AVP") and above (ii) Notified employees in the Finance, Compliance and Legal Departments and (iii) any other employees as designated by the Compliance Officer in consultation with the Managing Director of the Company.
4. **"Immediate Relative"** mean a spouse of a person and includes parent, sibling and child of such person or of the spouse, and of whom is either dependent financially on such person or consults such person in taking decisions relating to trading in securities.