



NEWEVER TRADE WINGS LIMITED

formerly, Newever Intrahomes Limited
CIN No. L74999WB2012PLC181106

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") under the powers conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 15th May, 2015 and the same were made applicable to all companies whose shares were listed on Indian stock exchanges. In order to comply with the same the Company is required to formulate Code of Practices and Procedures for Fair Disclosures.

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of Unpublished Price Sensitive Information which would impact the price of the Company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of unpublished Price Sensitive information and to prevent misuse of such information.

The Board of Directors of Newever Trade Wings Limited have always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving its objective, the Company will adhere to the following principles of Fair Disclosure of Unpublished Price Sensitive Information:

1. Make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company appointed under the said Regulation shall act as chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Provide 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.





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7. Develop 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.

Disclosure of Code on Public Domain: This Code and any amendment thereof will be published on the Company's website www.newever.in

Amendment to the Code: This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

This code has been duly approved by the Board of Directors at their meeting held on 28th day of May, 2015.

