

Code of Corporate Governance & Ethics



PARAMOUNT LIMITED

...A Total Water & Environment Management Company



Code of corporate governance & ethics **(Version 1.1)**

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Preamble

The purpose of this “Code of Corporate Governance and Ethics is to ensure a common understanding of the expectations from each paramount employee of their personal and professional conduct”.

The paramount code of corporate governance and ethics – Version 1 is hereafter applicable to all of us.

I would encourage each one of you to embrace the values and principles outlined in this code and in doing so, enjoyed an environment of mutual respect, fairness, transparency and integrity which are the hallmarks of Paramount.

K G Tuli
Chairman- Paramount Limited

17th September, 2016



Mission Statement of the Policy

- Uncompromising Integrity and value system
- Entrepreneurship
- Meritocracy
- Transparency

Dilip R. Shukla
Managing Director



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1. Definition / Interpretation

- 1.1 Managing Director or “MD” means business head of the company by whatever named called.
- 1.2 “The Company” means Paramount Limited.
- 1.3 “Employee” or “Paramount Employee” shall mean the all the employees of Paramount.
- 1.4 “Relative” of an employee or a director or any other person for the purpose of this code shall mean the relative as defined in the Companies Act 2013, as amended from time to time.
- 1.5 “Related Parties” to a Paramount shall mean the related parties as defined in the Companies Act 2013, as amended from time to time.
- 1.6 Words importing the masculine gender also include the feminine, transgender and neutral gender. Words importing the singular number include, where the context admits or requires the plural number and vice versa.

2. Investor Relations

Background:

Enhancing shareholder value is the primary objective of any Company. With increasing competition for scarce capital, it is important that shareholders are provided with services that compare with the best in business. The guidelines aim to achieve shareholder satisfaction.

Guideline:

- 2.1 Investor relation should be ethical, professional, transparent and investor friendly.
- 2.2 Relevant information should be speedily disseminated and shall be informative to the needs of shareholders.
- 2.3 Respond to the queries & observations of the shareholders to the fullest extent permissible.
- 2.4 No information shall be made available on selective basis to specified groups of investors.
- 2.5 Handling price sensitive information before it is made public: All Officers and Designated Employees of the



company shall, a) maintain the confidentiality of all un-published price sensitive information and shall not pass on, directly or indirectly, such information to any person by way of making a recommendation for the purchase or sale of shares of the company or otherwise. b) Keep secure all files/papers containing confidential un-published price sensitive information. c) Handle the unpublished price sensitive information(s) on a “need to know” basis, i.e. such Information shall be disclosed only to those persons within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information(s).

3. Financial reporting and records

Background:

It is essential that there is a fair and accurate presentation of Annual Reports prepared by the company. Following guidelines have been developed by assimilating best practices, investor needs and modern trends.

Guideline:

- 3.1 The company shall prepare and maintain its accounts fairly and accurately and in accordance with the company accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the conducts its business affairs.
- 3.2 Internal accounting and audit procedures shall reflect, fairly and accurately, all of the company’s business transactions and disposition of assets, and shall have internal controls to provide assurance to



the company's board and shareholders that the transactions are accurate and legitimate. All required information shall be accessible to company auditors and other authorized parties and government agencies. There shall be no willful omissions of any company transactions from the books and records.

- 3.3 Any willful, material misrepresentation of and / or misinformation on the financial accounts and reports shall be regarded as a violation of the Code, apart from inviting appropriate civil or criminal action under the relevant laws. No employee shall make, authorize, abet or collude in an improper payment, unlawful commission or bribing.

4. Quality of products and services

Background:

A customer-focused strategy is required to retain and expand customer base in a competitive environment. Customer satisfaction can be achieved by ensuring high standards of quality on products and services.

Guideline:

The company shall be committed to supply quality goods and services, backed by after-sales services consistent with the requirements of its customers within the framework of law.

5. Communication with media

Background:

Media reports influence corporate image, mould public perception and impact market capitalization. It is, therefore, essential to have a policy guideline and media strategy, at the Group and Company level, in order to achieve pre-determined objectives.

Guideline:

- 5.1 Communication with Media will primarily be the responsibility of MD/ Chairman/ Vice-Chairman.

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- 5.2 Corporate Communications should be involved in all communications plans.
- 5.3 No other individual is authorized to interact with media in official capacity.
- 5.4 No other individual is authorized to interact with media even in the individual capacity or at an informal level.

6. Social media

Background:

Social Media is a constructive and powerful communication tool for business. The code seeks to bring certain standards in the manner in which employees of the company express their views and communicate over this medium.

Guideline:

- 6.1 Social Media includes networking sites like Facebook, Twitter, LinkedIn, Youtube, Blogs, Wikis and other online forums.
- 6.2 No proprietary information (non-public) of the Company or its Clients shall be shared.
- 6.3 While employees are encouraged to be expressive of their views, respect for others views should be maintained.
- 6.4 No defamatory comments on the Company, its employees and its clients and associates shall be made.
- 6.5 Respect laws like copyright and other internet laws and avoid spreading rumours.
- 6.6 Employees shall maintain the Company's legal obligations towards its clients and therefore not use client's or customer's name or logo in any posting without express approval.

7. Paramount LOGO/ letterheads

Background

To ensure consistent practices within the company with regard to usage of "Paramount" logo, and the name "Paramount Limited".

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Guidelines:

- 7.1 The use of the company name and trademark shall be governed by manuals, codes and agreements to be issued by the company. The use of the company brand is defined in and regulated by the Paramount License Agreement. No third party or joint venture shall use the company brand to further its interests without specific authorization.
- 7.2 Logo shall appear on all visiting cards of employees of the company. Such use is permitted either under the License agreement or under prior written authority granted by the company. The format / position / presentation of this logo has been separately defined in the Corporate Identity Manual.
- 7.3 The logo should be clearly displayed on all official correspondence.
- 7.4 Correspondence at a Group level with third parties should be carried out on the letterhead of “Paramount Limited”. This will serve the purpose of conveying to the corresponding parties, the composite character of the company. Once the understanding has been arrived at, then binding contracts and memorandum of understanding should be made by the implementing companies.

8. Ethics

Background:

Ethics deal primarily with conflicts of interest and integrity. A conflict of interest could be defined as a situation that arises when a decision making authority is seen to have a personal stake in the outcome of the decision itself. This code covers various situations which an employee may face in the areas of financial control, personal integrity, conflicts, etc, and the role which they should play in such circumstances. This code provides a common code of conduct, which should be adhered to, by all employees of the company.



Guidelines:

8.1 **CONFLICTS OF INTEREST:**

An employee or director of the company shall always act in the interest of the Company, and ensure that any business or personal association which he / she may have does not involve a conflict of interest with the operations of the company and his/ her role therein:

8.1.1 An employee of the company shall not accept a position of responsibility in any other non-Paramount or not-for-profit organization without specific approval of MD.

8.1.2 An employee of the company shall not be involved in the decisions pertaining to companies where he / she holds financial interest directly or indirectly, including through relative in the company.

8.1.3 An employee of the company shall not direct business to a supplier managed by a relative, except a transaction made on arm's length basis.

8.1.4 An employee of the company shall not solicit subcontractors and vendors for donation / advertisements to a charity, in which the employee is involved.

8.1.5 An employee shall not use the facilities provided by the company for personal purposes or for spouse's /relatives business.

8.1.6 An employee of the company shall not treat personal expenses / trips as business expenses / trips.

8.1.7 An employee of the company shall not take up any part-time job.

8.1.8 Shall not pursue any business or profession outside the company including consultancy.



8.1.9 Competent authority, in the case of all employees, shall be the MD, who in turn shall report such exceptional cases to the CGEC on a quarterly basis.

8.1.10 Notwithstanding such or any other instance of conflict of interest that exist due to historical reasons, adequate and full disclosure by interested employees shall be made to the MD. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, including parents, spouse and children, may have in a family business or a or firm that is a competitor, supplier, customer or distributor of or has other business dealings with his / her .

Upon a decision being taken in the matter, the employee concerned shall be required to take necessary action, as advised, to resolve / avoid the conflict.

8.1.11 In the event the employee wishes to join a competitor, the employee concerned shall, simultaneously upon submission of the resignation, disclose about his / her intention of joining the competitor and agrees to strictly adhere to the confidentiality obligations as per clause 8.6 of this Code even after cessation of his/her employment with the company.

8.1.12 If an employee fails to make required disclosure and the management on its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee.

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8.2 MEMBERSHIP OF SOCIAL SERVICE ORGANISATIONS: Potential conflicts arise when executives take up memberships of Organizations and Associations that undertake Social Service of various kinds. Conflicts arise in the form of fund-raising from the company for such Associations / Organizations, using company infrastructure and facilities to discharge responsibilities towards that organization and providing use of such facilities directly to the Association / Organization and its members. Prior approval from MD or the Chairman, as the case may be, should be obtained, for undertaking such activities.

8.3 GIFTS

8.3.1 Buying equipment from suppliers for personal use at high discounts is absolutely prohibited.

8.3.2 Accepting free trips / holidays within India and / or abroad, for self and / or members of employees family, from suppliers is also absolutely prohibited.

8.3.3 Business associates such as JV partners, technology suppliers and other closely related companies may also make similar offers. These should be reported to by employees/MD to the MD or the Chairman, respectively, who shall provide guidance.

8.3.4 Small value gifts and flowers on festive occasions from anyone are normally acceptable. High value gifts – those in excess of Rs.2000/- in extraordinary circumstances, if required, need to be specially approved by the MD or the Chairman before acceptance.

8.4 DIRECTORSHIP OF FIRMS AND COMPANIES OUTSIDE THE COMPANY

8.4.1 All Directorships should be cleared by the Chairman's office.

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8.4.2 A new employee, who holds any directorships at the time of joining the company, he / she may continue with such directorships if the same is approved by the Chairman's office.

8.5 RELATIVES AS COMPETITORS: Close relatives in the employment of competitors should be disclosed with details of relationship and responsibilities held.

If employment is unavoidable or an ongoing one for a long time, executives should exercise great discretion in maintaining confidentiality of the company.

8.6 CONFIDENTIALITY AND DISCRETION: The company, should, at all times, realize that they are in possession of sensitive, classified and confidential information that should not be parted with, in any circumstances to any person including but not limited to the competitors, Investment analysts, Stock brokers, Newspaper reporters and Government officials, unless otherwise required to be disclosed under prevalent laws or directive or court of law. Some illustrations of such information are given here.

8.6.1 Financial Information.

8.6.2 Tax Planning Measures.

8.6.3 Potential Joint Venture deals being negotiated.

8.6.4 New Product Introductions.

8.6.5 Manufacturing Process and Recipe for Products.

8.6.6 Employees should maintain total confidentiality with any such classified information.

8.7 COMMON COMPANY CONTRACTORS FOR RESIDENTIAL HOMES: Office executives should not have the same contractors / architects, who are doing work for the company, for their personal jobs.

8.8 ACCEPTING HONORARIA FOR LECTURES OUTSIDE: This is not permissible unless specific prior approval is obtained from MD / or the Chairman, as the case may be. Such honorarium should be given to the company or the company's foundation.



8.9 SETTING UP PART – TIME BUSINESS OR TAKING PART TIME JOBS: This is not permissible. Every employee of the company is expected to give the best in terms of time, creativity and energy. Any such involvement will result in a conflict of interest situation.

8.10 PERSONAL INTEGRITY: In day – to – day work most employees are called upon to support broad objectives like providing equal employment opportunity and environmental protection. Some responsibilities are on a more personal level. For example, every employee also has a direct role in helping to keep the company's records accurate and in protecting assets

Sometimes the chance for illegal or unethical personal gain will arise. That time every employee must remember that integrity depends on individual integrity. Every employee should develop the ability to distinguish the right from the wrong and relentlessly follow the right - even when it may be very tempting to do otherwise.

8.11 SEXUAL HARASSMENT AT WORKPLACE: the company is committed to create a safe and healthy working environment that enables the employees to work without any fear or prejudice, gender bias and sexual harassment at workplace.

8.11.1 As a responsible corporate citizen, each employee shall fully commit to the said stated objective and will not tolerate any form of sexual harassment at work place and employees need to respect the dignity of women.

8.11.2 Every employee shall constitute an Internal Complaint Committee (ICC) to redress the complaints received from the women employees in accordance with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (SHW Act) and Rules



made there under against the employees of the company and also any visitor to its workplace which is in the nature of sexual harassment defined in SHW Act, particularly the following unwelcome acts or behaviour, whether directly or by implication:

8.11.2.1 Physical contact and advances

8.11.2.2 A demand or request for sexual favours

8.11.2.3 Making sexually coloured remarks

8.11.2.4 Showing any kind of pornography

8.11.2.5 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or jokes of a sexual nature, offensive flirtation or lewd remarks or comments on a person's sexual orientation, expression of sexual interest etc.

8.11.2.6 Non-verbal conduct of a sexual nature may include the display of sexually suggestive pictures, objects or written materials or gestures.

8.11.3 The following conducts amongst other circumstances connected with the complaint may also constitute an act of sexual harassment:

a. Implied or explicit promise of preferential treatment in employment or

b. implied or explicit threat about her present or future employment or

c. Implied or explicit threat about her present and future employment status

d. Interference with her work or creating an intimidating or offensive or hostile work environment for her

e. Humiliating treatment likely to affect her health or safety.

8.11.4 ICC being a quasi judicial body having power of the civil court shall ensure that inquiry, proceedings, including the process of conciliation and award of compensation etc.,



shall always adhere to the provisions of SHW Act/Rules made there under.

ICC shall also deal with the malicious complaints made by any woman employee strictly as per the provisions of SHW Act and Rules made thereunder.

8.11.5 The company shall ensure that the complainant shall not face retaliation from any official of the company for making any complaint under SHW Act.

8.11.6 Every employee shall display, at a conspicuous place in workplace, penal consequences of sexual harassment and also the order constituting the ICC.

8.11.7 Where such conduct amounts to a specific offence under the Penal Code or under any other Law, the employer shall initiate appropriate action in accordance with the Law by making a complaint to the appropriate authority. In particular, employers should ensure that victims and witnesses are not victimized or discriminated against while dealing with such complaints.

8.11.8 The victims of sexual harassment shall have the option to seek transfer of the perpetrator or their own transfer, should they deem necessary.

8.11.9 Every employee will develop relevant information, education, communication and training material and shall organize awareness programmes to disseminate the provisions of SHW Act and enhance the understanding among all its employees.

8.11.10 Every employee shall always comply with the provisions of SHW Act and Rules made thereunder, as amended from time to time, in letter and spirit.



8.12 CORRECTIVE ACTION

- 8.12.1 Corrective action may be required even if an employee reports a potential conflict of interest, in case there is a realistic possibility of damage and loss to the company. If situation could impair an employee's judgment or performance of the company or damage the company's reputation, or result in a direct financial loss to the company, steps should then be taken to correct the situation.
- 8.12.2 While the code has attempted to cover a number of areas, it cannot be comprehensive. Whenever any conflicts are perceived, it is best to consult the MD or the Chairman as the case may be, in such cases.
- 8.12.3 Any queries related to this Code may be referred to CGEC for resolution.
- 8.12.4 Any incidence on breach of any provision of this Code, including through anonymous letters should be referred to CGEC, for further action. CGEC has been empowered to initiate any inquiry proceedings/ investigations and decide upon disciplinary actions and / or institution of appropriate legal proceedings. The decision taken by the CGEC will be final and binding.

8.13 CODE OF CONDUCT

- 8.13.1 You shall devote your whole time and attention to and use your best skills and care in the business and affairs of the company and at all times faithfully and diligently perform such duties assigned to you by the company.
- 8.13.2 You shall not at any time during the continuance of the employment hereunder solicit, seek, engage or be interested or concerned either directly or indirectly or alone or jointly in any other office, trade, business or occupation without the prior permission in writing of the management.



8.13.3 Notwithstanding anything to the contrary in this document if, in the opinion of the , you commit any breach in the observance of performance of your obligations hereunder or if you are, in the opinion of the company, guilty of any misconduct, including disobedience, breach of duty or gross carelessness or if you absent yourself without leave then and in any and every such case it shall be lawful for the company, (notwithstanding any waiver by the of antecedent breach or circumstances justifying the termination of your services under this clause) to terminate this employment forthwith without notice whatsoever and/or to dismiss you from the services without prejudice to the company's remedial rights in respect of such breach or circumstances. In the event of such termination or dismissal you will be entitled to your salary including all allowances upto the date of termination

8.13.4 As a corollary to your obligation under clause 8.13.2 above, you shall devote your whole-time attention to the company and use your best skills and care for the benefit of the company and any discovery or invention or secret process or improvement in procedure made or discovered by you or any work capable of copy right whilst in the service of the in connection with or in any manner affecting or relating to the business of the company or capable of being adopted for use therein or in connection therewith, shall forthwith be disclosed to the management and if and whenever required to do so by the company, you shall, at the cost the company, apply or join the company in applying for letters, patents or other equivalent protection in India and in any other part of the world for any such discovery, invention, process or improvement as aforesaid and shall at the cost of the company execute and do all instruments and things necessary for vesting the said letters patents or other equivalent protection when obtained and all right, title and interest to and in the same shall vest in the company absolutely and as sole beneficial owner or in such other person as the company may specify.

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- 8.13.5 During your association with the company, you will have access to and be furnished with such information, trade secrets, processes, inventions, customer/supplier lists, etc. which would be sensitive for the company and therefore would be treated as absolutely confidential (Confidential Information) and you may yourself develop or be a contributory to such Confidential Information. Hence, as a corollary to your duty to act always in the interest of the company, you shall be obliged not to divulge or communicate to any person other than necessary to those who need to know such information for the company's business and use such Confidential Information solely for the benefit and in the best interests of the company.
- 8.13.6 All Confidential Information belongs to the company and is always to be used for the company's benefit, needless to mention, such obligation on your part will have to be honoured, even after you cease to be associated with the company. Hence, if there is any apprehension that the Confidential Information could be misused to the company's detriment, you should refrain from associating, joining, or taking up employment with any other person for such period, as is considered necessary by the company. You can also during the tenure with the company and during the notice period prior to your separation from the company be restrained from coming to work, associating or communicating with officials of the company for such time as is considered necessary.
- 8.13.7 Considering the sensitivity of the confidential information which will come to your knowledge, you shall not engage in any activity even after ceasing to be in employment with the company, which will adversely affect the interest of the company including advising and utilizing the information to the disadvantage of the company.
- 8.13.8 You shall not at any time within twelve months after the cessation of your employment with the company, either directly or indirectly, or through any proprietary firm or a partnership firm in which you



are a partner or through any company in which you are a shareholder or director (holding 2% of the paid up capital in that), or engage with, in any manner whatsoever, solicit or seek to employ or appoint as agent, or engage with, any employee or officer or associate of the company unless a period of twelve months has elapsed since the date of separation of the concerned employee, agent or associate, unless specifically approved by the MD.

8.13.9 You shall also not request, encourage or cause any of the past, present or prospective customer, supplier, employee or independent contractor to withdraw, curtail or cancel a business relationship with the company or otherwise interfere in any manner with the relationship between the company and such past, present or prospective customer, supplier, employee or independent contractor.

8.13.10 You will fully comply with all rules and regulations as applicable in the company as well as company's Corporate Governance & Ethics Code.

9. Competition

Background: To ensure fair practices in the marketplace.

Guidelines:

The company will not carry on business activity in such manner which is illegal, unethical or through unfair business practices.

10. Political non alignment

Background: As a secular and non political organization, the company shall not have any type of political alignments.

Guideline:

10.1 The company shall be committed to and support the constitution and governance systems of the country in which it operates.



10.2 The company shall not support any specific political party and not have any political affiliations. However, it can give political contribution to an approved Electoral Trust, with the prior approval of the Chairman and the Board of Directors. The Board's approval shall be sought after obtaining consent of the Chairman.

10.3 The company employees are free to contribute or participate in the political process if it does not create conflict of interest or impinge work related commitments.

11. Protecting assets

Background: It is the responsibility of all employees to protect the interests of all stakeholders of the company.

Guideline:

The assets of the company shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

12. Donations

Background:

To ensure compliance with Companies Act and to ensure discipline in usage of company's funds.

Guidelines:

12.1 Donations, if any, by the company shall be made in accordance with the provisions of the Companies Act, 2013 with prior approval of Board of Directors. The Board's approval shall be sought after obtaining consent of the Chairman.



12.2 A non business advertisement of in excess of Rs. 10,000/-, including an advertisement in the souvenir or any similar support, either directly or indirectly, shall not be made without prior approval of the MD/Chairman.

13. Corporate citizenship:

Background: As a leading business Group in India, the company shall be committed to good corporate citizenship.

Guideline:

- 13.1 The company shall be committed to good corporate citizenship, not only in the compliance of all relevant laws and regulations, including applicable laws of the foreign country where the company has business presence, but also by actively assisting in the improvement of quality of life of the people in the communities in which it operates. The company shall encourage volunteering by its employees and collaboration with community groups.
- 13.2 The company is also encouraged to develop systematic processes and conduct management reviews from time to time so as to set strategic direction for social development activity in accordance with the provisions with Section 135 of the Companies Act 2013 and Rules made thereunder, as amended from time to time, particularly nature of the project undertaken and spend on such projects.
- 13.3 The company shall not treat these activities as optional, but should strive to incorporate them as an integral part of its business plan.

14. Compliance with the code

Background:

For this code to be effective it is essential to ensure proper compliance at all levels of the company.



Guideline:

- 14.1 The company has formulated Corporate Governance & Ethics Committee (CGEC) to ensure the proper compliance of this code. The details, like name of the committee members and their contact no., are available with HR department.
- 14.2 Corporate Governance & Ethics Committee (CGEC) is responsible to ensure these principles are communicated to and understood by all to whom these are addressed.
- 14.3 Every employee is required to formally acknowledge that they have received this Code and understood and it is obligatory for them to comply with this Code at all the times.
- 14.4 CGEC will be responsible for the review of the provisions of this code from time to time and also to clear doubts and give clarifications to employees.
- 14.5 Employees are expected to report non-compliance or potential non-compliance to CGEC which in turn promises complete confidentiality.

15. Equal opportunity

Background:

The company is committed to ensuring equal opportunities based on meritocracy to all its employees and potential employees.

Guideline:

- 15.1 The company shall provide equal opportunities to all its employees and all qualified applicants for employment.



15.2 Employees of the company shall be treated with dignity and in accordance with the company policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological.

16. Third party representation / Regulatory compliance

Background:

This code seeks to prevent misuse of intellectual properties of the company by the third parties or associates without the express written consent from the management.

Guideline:

16.1 Parties which have business dealings with the company such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers, shall not be authorized to represent the company without the written permission of the MD/ Chairman/ Vice-chairman.

16.2 Third parties, which have business dealings with a Paramount policy, and their employees, are expected to abide by the Code in their interaction with, and on behalf of the company. The company is encouraged to sign a non-disclosure agreement with third parties to support confidentiality of information.

17. Integrity of data furnished

Background:

Significant financial implications arise from integrity of data furnished by any employee of the company and therefore are a crucial area to be governed.

Guideline:

Every employee of the company shall ensure, at all times, the integrity of data or information furnished by him/her to the company. He/she shall be entirely responsible in ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside person/party in the course of normal operations without express guidelines from or the approval of the management.



18. Whistle Blower Mechanism

Objective:

The company is committed to ensure compliance of all the applicable laws, Code of Corporate Governance & Ethics adopted by it and also the policies and procedures framed by it from time to time, by the Directors and employees of the company.

Guidelines:

All the Directors and employees of the company or its suppliers or business partners shall report their genuine concerns and actual / potential violations of all the applicable laws, Code of Corporate Governance & Ethics and also the policies and procedures framed by it from time to time, to the designated officials of the company fearlessly, as provided in Section 177 of the Companies Act, 2013 and Rules made thereunder, either by a letter or a document addressed to the Corporate Governance & Ethics Committee, Paramount Limited, C/o Paramount Complex, Gotri Road, Vadodara- 390007 or through Email : ethics@paramountlimited.com.